AGENDA
NKGSA Advisory Committee Meeting
November 15, 2019, 1:30 PM
Clovis Public Safety Community Room, 1233 Fifth Street, Clovis, CA

Conference Call Number: (559) 324-2995

1. Call to Order

2. Approval of Minutes from August 9, 2019 Meeting

3. Receive – Basin Coordination Update

4. Ad hoc Subcommittee Updates and Actions
    - Technical
        i. Recommend adoption of GSP incorporating recommended revisions – Action Item
    - Administrative/Fiscal
        i. Recommend adoption of Support and Endorsement Policy – Action Item
    - Membership/Outreach/Communications

5. Public Comments

6. Member Comments

7. Adjourn

MINUTES
(Preliminary – Subject to Revision/Approval at next meeting)

NKGSA Advisory Committee Meeting
August 9, 2019
Clovis Public Safety Building

In attendance:

*Scott Redelfs – City of Clovis
*Adam Claes – FID
*Ken Moore – City of Kerman
*Glenn Allen – Fresno County
*Nick Keller – Garfield WD
*Alan Hofmann – FMFCD
Brandy Swisher – FMFCD
Paul Armendariz – City of Clovis
Brock Buche – City of Fresno
Lisa Koehn – Clovis
Dale Perales – Clovis
Sandy Perales – Clovis
Mike Prandini – BIA
Diane Merrill – League of Women Voters
Mary Perich – League of Women Voters
Sue Ruiz – Self-Help Enterprises
Ronnie Samuelian – Provost & Pritchard
Michael McGinnis – DWR
Gary Serrato - FID
Dao Lor – ABIRC
Michael Barajas – City of Kerman
Eduardo Antunez – Biola CSD
Chris Johnson – Aegis Groundwater Consulting
Don Wright – Reporter
Kristen Greenacre – DWR
Martin Cawthorne – Resident (Fresno Co.)
Sayre Miller – Ag
Natalie Escobedo – Leadership Counsel (conference call)

* - Voting representative on Advisory Committee

Item 1 – Called to order at 1:31 PM

Item 2 – Approval of Minutes from 06/14/19 Meeting

Motion by Ken Moore to approve; second by Glenn Allen. Approved unanimously.

Item 3 – Receive – Ad Hoc Subcommittee Updates

Item 3a – Technical Subcommittee

(Subcommittee update presented by Adam Claes)

The Subcommittee is working on finalizing details of the GSP and has been meeting monthly. In July, committee members reviewed and commented on the GSP, and there was a high amount of feedback provided. If approved, the next step for the GSP would be a public comment period beginning on August 16th and a 90-day notice for a public hearing. On September 16th, there will be a second notice for comment. The final draft is expected to be adopted at the November board meeting.

The first annual GSP report/update will be due in April 2020 (just three months after the required adoption date in January 2020), with annual updates to follow every April thereafter. This is in addition to the required 5-year updates.

Item 3b – Administrative/Fiscal Subcommittee

(Subcommittee update presented by Lisa Koehn)

The Subcommittee met on June 4th and approved the budget for the new fiscal year.

Item 3c – Membership/Outreach/Communications (MOC) Subcommittee

(Subcommittee update presented by Brandy Swisher)

The main focus of the Subcommittee right now is communications and engagement related to the draft GSP. The updated GSP PowerPoint presentation will be on the NKGSA website once it is complete, public notices will be published in the newspaper (twice – 1 month apart), and there will be news

releases to local media outlets. The Subcommittee is also planning 2 public workshops in the near future. The next meeting of the Subcommittee will be this Tuesday to discuss other ways that outreach regarding the draft GSP can be accomplished. One idea that they are looking into is having hard copies of the GSP at specific local libraries to make the plan accessible to those without home computer/internet access.

Item 4 – Receive – Basin Coordination Update

(Update presented by Ronnie Samuelian)

All GSPs in the GSA are scheduled to be completed by September, with some draft plans already being released to the public (the McMullin Area GSA released theirs on July 10th and the North Fork Kings GSA released theirs on July 17th). All adoptions are planned for some time between October and December.

Item 5 – Recommend Public Release of Draft GSP & Setting Public Hearing Date – Action Item

If approved, a Special Board Meeting will be held on August 15th to request authorization and direction to schedule a public hearing and to start the public comment period of the draft GSP. There were few comments by the voting representatives of the Advisory Committee, but all comments made mentioned satisfaction with the draft plan.

A Fresno County resident requested clarification regarding who would be authorized to give final approval to the plan. It was explained that DWR would be the entity ultimately approving the plan, and they would have 2 years to review and approve (or require changes). The plan must be in full effect and the GSA achieving sustainability by 2040.

There was further discussion of outreach to the Clovis/Fresno area and how workshops would be handled with local/city entities, as well as outreach to groups of interest such as environmental groups, etc.

There were concerns raised over the size of the GSP and how it would be uploaded for public review. The printed plan is almost 700 pages, so for ease of digital use, it may need to be broken up before uploading to the website.

Motion by Ken Moore to approve; second by Glenn Allen. Approved unanimously.

Item 6 – Public Comments

There was concerned raised over whether the Advisory Committee is planning to continue meeting monthly after the plan is adopted. It was confirmed that the Advisory Meeting will indeed continue to meet on an ongoing basis (though as usual, there may be occasionally cancellations due to lack of actionable items).

Item 7 – Member Comments

There was significant discussion about public review/comments on the plan and how those comments would be handled. The Technical Subcommittee will be tasked with evaluating and responding to public comments. Among the questions raised were: if each and every comment would be directly responded to; if the responses to these comments would be available for public viewing; would individuals from the public then be allowed to further respond to these responses; and what recourse would people have if they found the responses unsatisfactory.

A lot of the exact procedure for dealing with public review comments is undetermined at the moment, and depending on the responses during the public review process, there may have to be some flexibility in how these issues are dealt with. Ronnie commented that per DWR, responses to public comments are not necessary, so by committing to respond and attempt to make the process as transparent as possible, we are already going above and beyond what is required. It was also reiterated that DWR will have its own review process after the GSP submission and public review process, and that nothing is being set in stone yet.

Item 8 – Adjourn

Motion by Nick Keller to adjourn; second by Alan Hofmann. Approved unanimously. Adjourned at 2:40 PM.

Recommended GSP Revisions

The first paragraph is in the Aug 15, 2019 public draft GSP. Text in "track changes" is new proposed language. Figures 4-3 through 4-6 are new proposed figures to accompany new language.

4.2.2.3 Impact of Minimum Thresholds on Beneficial Uses and Users

Regulation Requirements:

§354.28 (b) The description of minimum thresholds shall include the following:
(4) How minimum thresholds may affect the interests of beneficial uses and users of groundwater or land uses and property interests.

The minimum thresholds have been established based on historic rate of decline, the proposed mitigation rate and enough operational flexibility to maintain delivery during a 5-yr drought. The minimum thresholds have been determined based on the plan to correct the existing overdraft with an incremental approach intended to result in stabilized groundwater levels by 2040. Stabilizing the groundwater levels will provide more certainty of the long-term availability of groundwater supply for all beneficial uses and users. Property values have always been influenced by the presence and depth of a useable well. Minimum thresholds may affect those property values with existing wells with depths shallower than the minimum threshold. The NKGSA recognizes that some shallow wells will likely go dry prior to water levels reaching stabilization. Without SGMA and the proposed incremental mitigation by the NKGSA, these wells would have gone dry sooner, requiring the landowner to deepen existing wells. The minimum thresholds have been established to allow for continued beneficial use within the NKGSA and provide improved long-term certainty of groundwater levels within the NKGSA.

An analysis was performed to estimate the number of domestic wells that may go dry at the minimum threshold. Utilizing the minimum threshold depth at each of the water level monitoring well sites shown in Table 4-3 (and included in Appendix 4-A, location shown in Figure 5-2), a groundwater level contour surface was generated for the entire GSA utilizing GIS software. From this surface, the estimated average depth to groundwater in each Section (one-square mile) was obtained which provides an estimate of the depth to groundwater at the minimum threshold. The depth to water at the minimum threshold in each section was compared to the well completion report records available from DWR. DWR's well completion reports are grouped by section, but locations within each section are not known. It is important to note the inaccuracies of the well record data, including inaccurate locations and construction information, no consideration of abandoned or inactive wells, and no consideration of well modifications. For this comparison, all domestic wells were selected from the DWR records. The perforation interval of the well was considered if included in the well completion report, otherwise the total depth of the well was considered. For every domestic well in each section in the GSA, the minimum threshold depth was compared to ten feet above the bottom of perforation interval (if known) or ten feet above the total depth of the well. Sections that are entirely contained within the boundaries of a community water system (City of Fresno, Clovis, etc.) were removed from the comparison, but if only a portion of the section was within the water system service area or within the GSA's exterior boundary, all of the wells in the section were included in the analysis since the exact location of the wells in a section is not included in the available data. This likely includes many wells that have been abandoned, but was considered a conservative approach to this evaluation. The results of this analysis are shown in Figure 4-3 showing the number of wells in each section that may be impacted.

Since the first comparison to minimum thresholds included all wells regardless of age, and many of those wells have likely been abandoned or failed, a second comparison was performed for wells

constructed after 1990. 1990 was chosen as a comparison to provide a range of the estimated impact to wells that will be up to 50 years old in 2040. The results of this analysis are shown in Figure 4-4.

Since the minimum threshold is the lowest depth that is anticipated, a third comparison was made to the measurable objectives using all domestic wells in DWR records. Utilizing the measurable objective provides an estimate of the low end to the range of wells that may be impacted as the measurable objective is the groundwater level that will be sustained. A contour surface was generated using GIS software for the entire GSA utilizing the measurable objective depths from Table 4-3 (and identified in the hydrographs in Appendix 4-A). The results of this analysis using all wells in DWR records is shown in Figure 4-5.

A fourth comparison was made using measurable objectives using the same process, but limiting to wells constructed after 1990. The results of this analysis are shown in Figure 4-6.

For each of the four comparisons, the number of domestic wells shallower than the minimum threshold or measurable objective were totaled and compared to the total number of domestic well records. As mentioned previously, the total number of domestic wells used in these calculations is based on DWR records, and may include abandoned, destroyed, or inactive wells. Table 4-4 provides a summary of the results and an estimate of the percentage of wells impacted.

Table 4-4 Estimate of Percentage of Domestic Wells Shallower than Minimum Threshold or Measurable Objective

Wells Used	Shallower than Measurable Objective	Shallower than Minimum Threshold
All Wells	12%	32%
Post 1990 Wells	3%	13%

In summary, the analysis shows that the estimated percentage of domestic wells that may be affected at the measurable objective levels is between 3% and 12%, and between 13% and 32% at the minimum thresholds. Utilizing all well data and all wells in a section that is only partially outside a community water system is very conservative considering the data includes many wells that are no longer active or are nearing the end of their usable life. For these reasons, it is anticipated that the percentage of impacted wells is closer to the lower percentages listed. These percentages may be refined as the GSP is implemented.

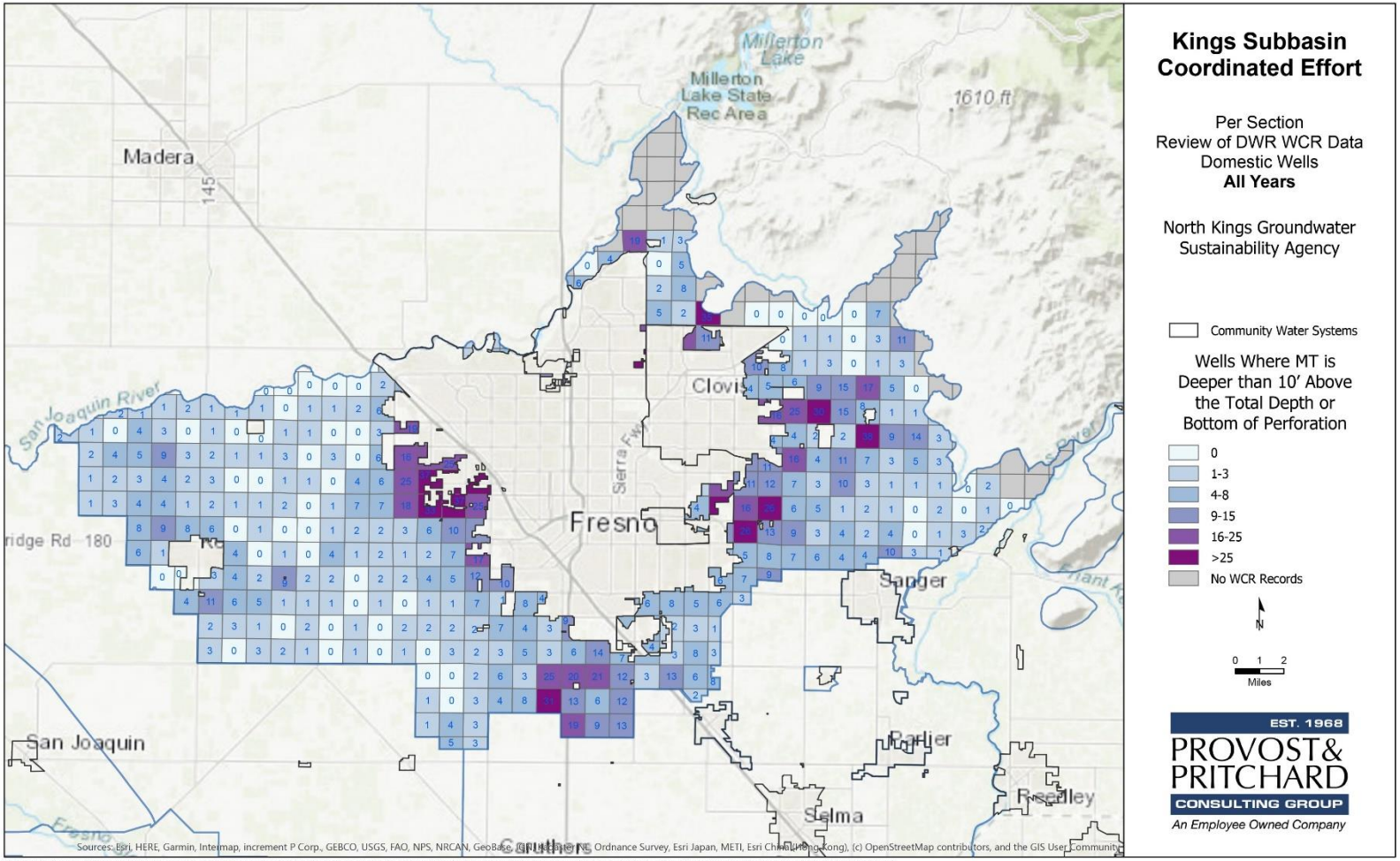

Figure 4-3 Domestic Wells from All Years compared to Minimum Threshold

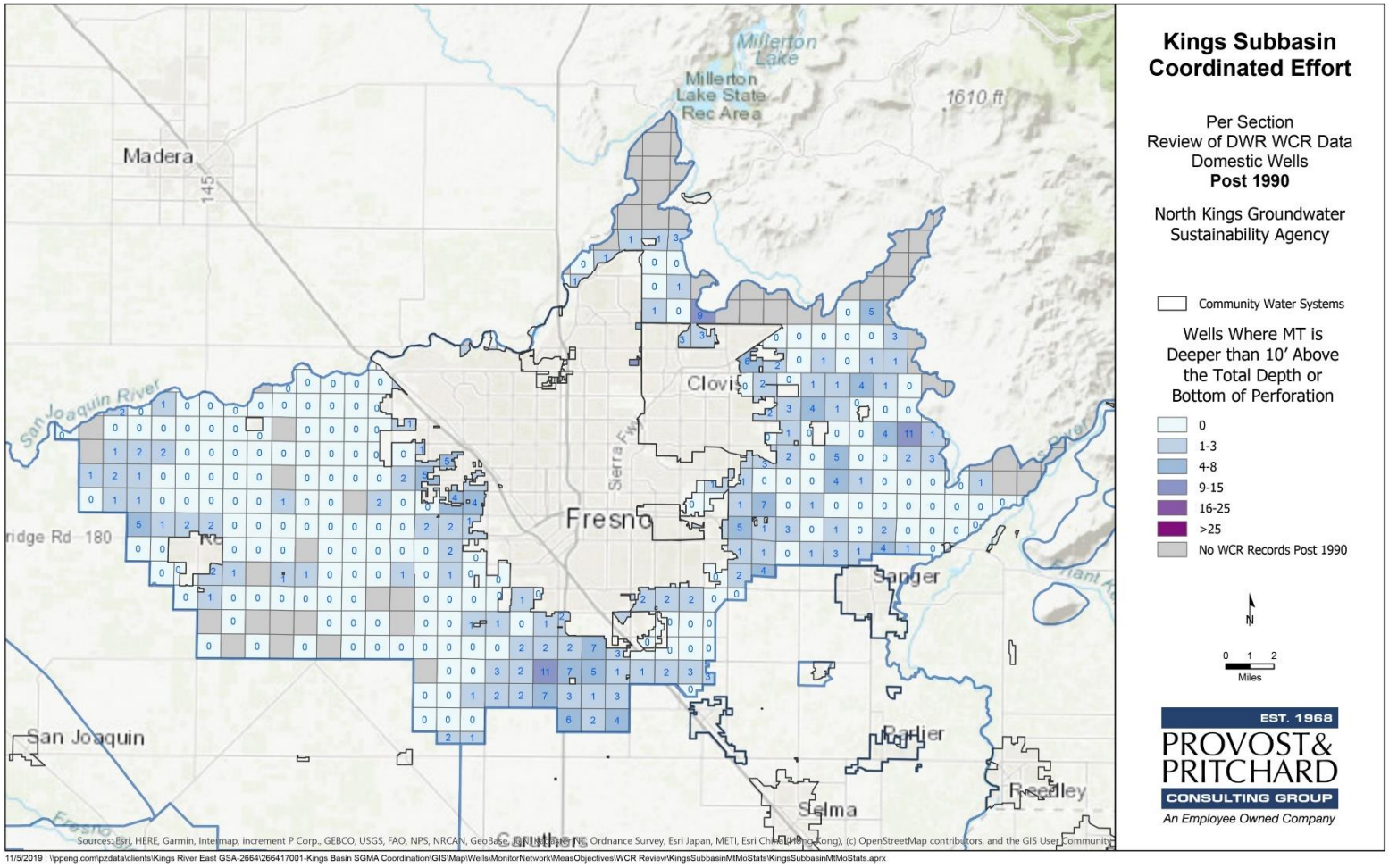

Figure 4-4 Post 1990 Domestic Wells compared to Minimum Threshold

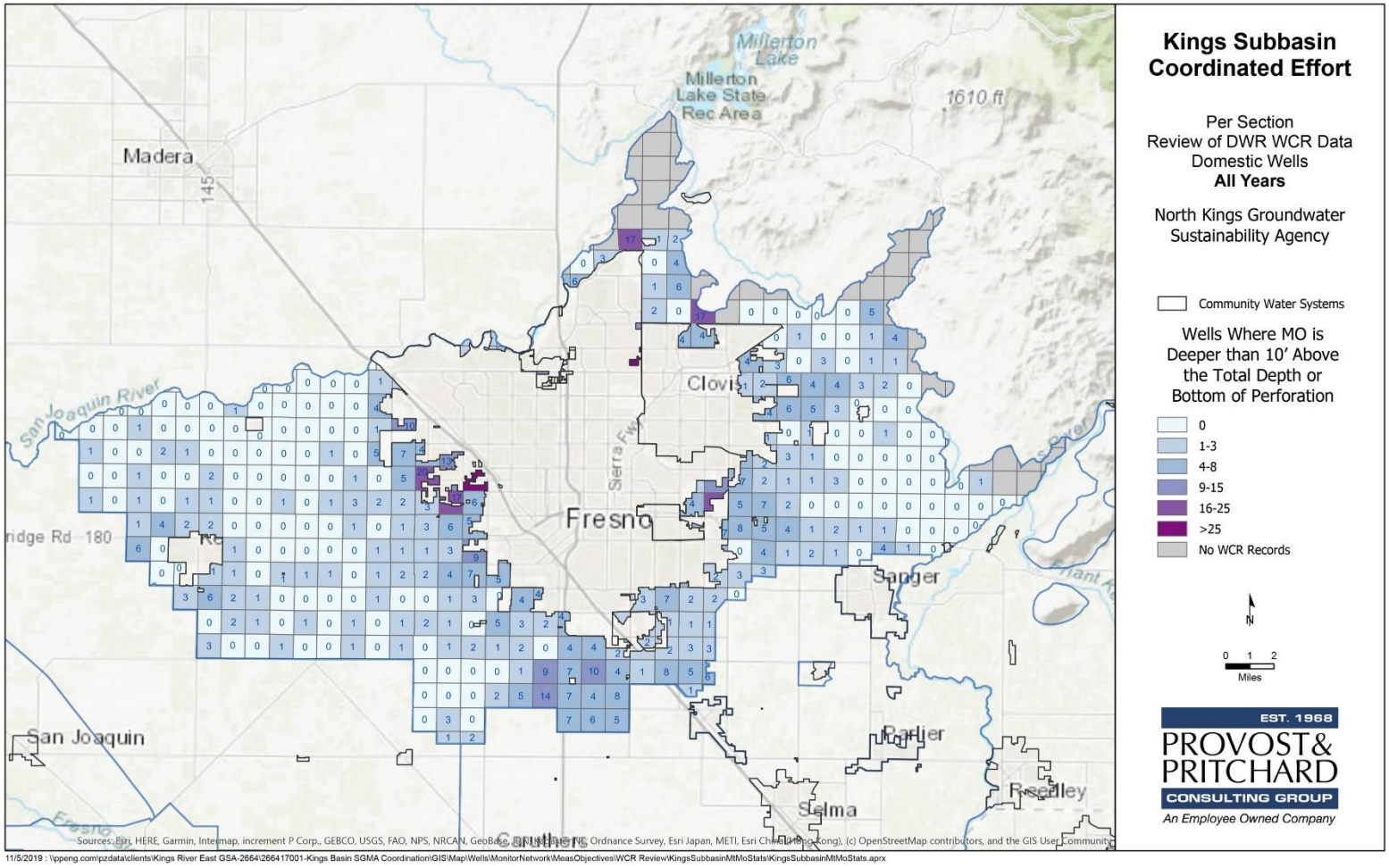

Figure 4-5 Domestic Wells from All Years compared to Measurable Objective

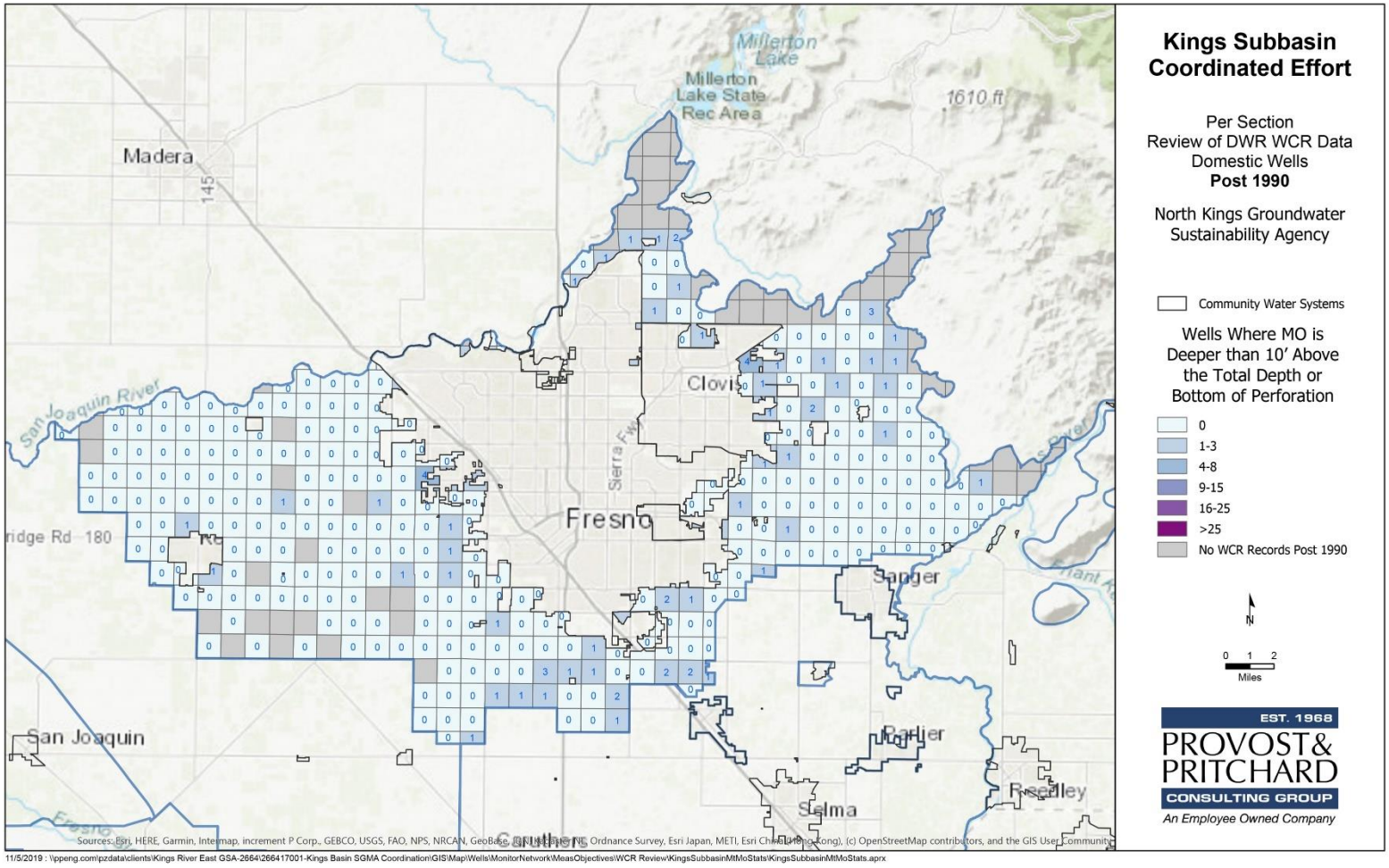

Figure 4-6 Post 1990 Wells compared to Measurable Objective

NKGSA COMMENTS/RESPONSES NOT ADDRESSED IN 8-15-19 PUBLIC RELEASE DRAFT & KASSY CHAUHAN'S COMMENTS

Comments not addressed in 8.15.19 Draft.
Final draft of GSP has been updated based on comment.

No.	From	Section	Page	Comment	Response
49	Dr. Cehrs	Appendix 3-B		Put nearest street intersections on hydrographs	GSP will be changed to add cross-streets to hydrographs in Appendix 3-B and 4-A for final draft, after public release.
57	Dr. Cehrs			Attachment 2 North Kings Groundwater Sustainability Agency Native Safe Yield. "Need to show each column is in AF."	GSP will be changed.
58	Dr. Cehrs	4.1	4-2	In the second to last paragraph, reference the table that has the GSAs initial overdraft quantities.	Changes will be made
65	Dr. Cehrs	4.3	Table 4-4	Table 4-4: Estimate of Groundwater in Storage between MO and MT. Awaiting Data.	Table will be updated
78	Dr. Cehrs	Appendix 4-A		Show MOs and MTs on hydrographs. It would be good to put a nearby street intersection for each hydrograph – and maybe a map with their locations (reference to prior maps).	MOs and MTs are shown on hydrographs. Interim milestones and street intersections will be added.
88	Dr. Cehrs	3.3.1	3-84	Regarding Historical Water Budget: *"I think we are doing the constituents of the NKGSA a disservice by not including/showing what happened from 2012 through 2018 – the gw drop during the drought, some recovery during 2017 and what ever it did during 2018. The reason I say this is that we may have longer droughts in the future (climate change models indicate this) and they will adversely affect (lower) the amount of groundwater that can be pumped and the GSA remain sustainable."*	Addition will be made to the GW Conditions section.
91	Dr. Cehrs	3.3.2	3-85	Regarding: The best available data for the water budget was often incomplete, had to be estimated, or was based on assumptions. The confidence intervals for each parameter vary from 5% to as high as 50%. "*Maybe you should show these values on table 3-4 for each variable.*"	The confidence intervals will be added.
157	Lisa Koehn	4.3	4-14	Table 4-4 is empty.	Table will be updated in accordance with basin numbers.
202	Sayre Miller	2	Figure 2-2	The proper name of the planned community is Quail Lake, singular.	Change will be made.
209	Adam Claes/FID	ES	ES-5	Between the two paragraphs, add a paragraph… "Currently, the GSAs in the subbasin have agreed to the following responsibilities: (show the table listing each GSA and their AF responsibility). The subbasin's GSAs have also agreed to come back and review these responsibilities no less frequently than every 5 years to determine if changes are necessary."	Change will be made.
212	Adam Claes/FID	ES	ES-7	Also include a depth to water contour map, and consider putting that map above the groundwater elevation map on that page.	Map will be added.
214	Adam Claes/FID	ES	ES-8	Figure ES-5 – Trim the blue line right of the drought period…no reason to project conditions in this chart.	Change will be made.
224	Adam Claes/FID	ES	ES-12	Figure ES-7 – Should we show Figure 4-2 instead?	We don't recommend changing.
247	Adam Claes/FID		Appendix 2-B	Community Engagement Activities List – Reminder to update with latest list before next printing of GSP	Update will be made.

272	Adam Claes/FID	6.2	6-1	Project list needs to include County projects, programs, ordinances, policies, planning related to the “white area”.	County projects/actions will be added.
343	Nick Keller	2	2-12	For Garfield Water District description. 21 landowners should be changed to 55 landowners.	Change made.
354	Brock Buche	2	2-1	1. Recommend this section be numerated as Section 2.1.1. 2. Figure 2-1 is missing.	Section numbering will be reviewed, but must stay consistent with others in basin.
355	Brock Buche	2	2-1	Land Use. Recommend this section be numerated as Section 2.1.2.	Section numbering will be reviewed, but must stay consistent with others in basin.
356	Brock Buche	2	2-4	Water Sources 1. Recommend this section be numerated as Section 2.1.3. 2. Second sentence: Add landscape as a use. Both Fresno and Clovis have specific “landscape” billed services. 3. Third sentence reads awkwardly.	Section numbering will be reviewed, but must stay consistent with others in basin.
359	Brock Buche	2.1	2-8	Summary of Jurisdictional Areas and Other Features. Recommend renumbering this section to 2.2.	Section numbering will be reviewed, but must stay consistent with others in basin.
364	Brock Buche	2.2.3	2-22	Conjunctive Use Programs, fifth paragraph. This paragraph discusses recharge efforts. As such does it make sense to expand the discussion and provide average annual recharge quantities in a table?	No change planned for this section.
365	Brock Buche	2.3	2-23	Relation to General Plans. Recommend renumbering this section to 2.4.	Section numbering will be reviewed, but must stay consistent with others in basin.
374	Brock Buche	3.1.12	3-38	Recharge and Discharge Area. Existing Recharge Areas, the 3rd sentence states “percolation of precipitation is considered minor.” In the 1969 Carollo report is was cited this would amount to approximately 5,000 AF. An accounting for precipitation percolation needs to include the appropriate amount.	Amount to be confirmed and updated if required.
378	Brock Buche	3.2.1	3-48	Vertical Gradients. In reference to the discussion in the last paragraph it may be beneficial to identify on Figure 3-23 the location of the gradient areas.	Location reference will be added in the text.
385	Brock Buche	3.3.2	3-88	Table3-5. In Note 1 “water” is misspelled.	Change will be made.
390	Brock Buche	3.3.1	3-92	Deep Percolation of Precipitation. 2nd paragraph from top states the provided deep percolation was only applied to rural areas. The accounting for Urban Storm Water appears to only be that water captured in flood control basins and not from deep percolation. The 1969 Carollo report estimated 5,000 AF of deep percolation in the year 2000 for the Fresno metropolitan area.	Data will be reviewed and modified if required.
391	Brock Buche	3.3.1	3-93	Urban Stormwater – Recharge. It is stipulated “20% of rainfall percolates to the groundwater.” This may only account for flood control basin deep percolation. Additionally, there is channel seepage of flood flows that that are discharged from the basins. The FMFCD conducted a study in 2016 that provides runoff, capture, and discharge volumes, that may be helpful in refining accounting of urban stormwater recharge.	Data will be reviewed and modified if required.
406	Brock Buche	5.1.3	5-3	Description of monitoring network. Was the intent to have Section 5.1.3 Description of Monitoring Network actually be Section 5.2? If not, the flow of the subsequent sections here seems off.	No change planned as section follows regulation requirements and matches others in basin.
426	Brock Buche		6-3	Table 6-1. Keep City of Fresno Meter Project in the Plan for same reasons given for keeping the Bakman WD meter project in the plan.	Meter projects will be included if conservation benefit is not included in 2040 demand forecasts, and removed if 2040 demand forecasts already include the water conservation benefit from meters.

452, 453, 456, 457, 459, 460, 461, 462, 467, 474, 476	SHE	2, 3.2		Multiple Comments	See responses to Public Comments received from SHE
480	SWS Group and SHE		2-36	We suggest identifying which communities are DAC and SDAC. Malaga believes they may be an SDAC. West Park is SDAC based on a SHE Income Survey. Biola is SDAC. The communities of Britten and Daleville, also identified on the map/s are SDAC (SHE has a Survey). Centerville is SDAC. Rolinda is likely SDAC. I'm (SUE) going to suggest we add a small community/neighborhood on Orange and East Avenues to the list and map, very likely SDAC and starting to ask for connection to the City for water. There is a known significant percentage of dry wells currently in this community. We strongly suggest developing this section as much as possible prior to release of the GSP to the Public, absolutely prior to release of the Plan to DWR.	GSP text describing Figure 2-8 will be modified.
484	Kerman		5-24	The Double L Mobile Home Park located at Church Avenue and Floyd Avenue will be abandoning their water wells soon, as a requirement for connecting to the Kerman Water system.	No change planned to figure since not connected yet.
487	Fresno County	General		In regards to General Plans there are several locations within the document, which will be identified in scanned pdfs, where the language indicates that revisions will need to be made or modified to become compliant with all of the various components of SGMA and consistent with the goals and objectives of the GSP. However, the County is unaware of any planning law which requires such actions. Please refer to Government Code 65352(a)(8) which requires the legislative body to refer any planned action on a General Plan to a GSA, and in turn the GSAs responsibility to report the anticipated effect of the proposed action to the legislative body per Government Code 65352.5 (d)(3).	Will confirm changes needed with County and modify language if required.
1	Kchauhan	ES - 1.4	1-4	This section acknowledges there is a data sharing agreement in the works between the NKGSA and the Madera Subbasin. What is the status of the data sharing agreement. Is there further discussion necessary given the GSP for the Madera Sub basin shows that they are getting bout 60,000 AF of inflow from the NKGSA into their sub basin?	There is no written agreement, but the agencies within the GSAs have shared data for decades. An agreement was drafted and presented to Madera but they have not signed. Yes further discussion needed.
2	Kchauhan	2.2.1	2-16	The GW quality monitoring section indicates the requirements for testing are based on the size of the community system. GW monitoring requirements are determined based on the public water system classification and size. This should be added.	Change has been made.
3	Kchauhan	2.3.4	2-27	The permitting new or replacement wells section includes the sections of the Fresno County general plan related to drilling new or replacement wells. Policy PF-C.20 prohibits the County from permitting new private wells within areas served by a public water system. This section should also mention SB1263 which prohibits the formation of new public water systems where	Description of SB1263 has been added.

				there is an existing public entity within 3 miles that will agree to provide water service.	
4	Kchauhan	2.3.4	2-27	This section indicates NKGSA may consider a process for permitting new or replacement wells that is consistent with the County General Plans and references Section 6. I would suggest referencing the specific section in Section 6 that addresses additional actions the NKGSA may consider - Section 6.3.2 is the specific section that talks about these additional considerations.	Reference has been changed to Section 6.3.2.
5	Kchauhan	2.4.2	2-30	The Wellhead Protection section talks about following what's required in the CA Well Standards. I would recommend getting on the list of reviewing agencies with the FCPHD (similar to Malaga CWD) so that we can ensure the well complies with DWR Well Standard requirements or at least indicate this is something the NKGSA will consider.	No GSP change planned to this section since describing plan area. GSA should take action to be on review list.
6	Kchauhan	2.4.4	2-32	This section indicates the member agencies will encourage landowners and developers to convert unusable wells to monitoring wells, rather than destroy them, so that they can become a part of the region's groundwater monitoring program. Is there a process for this or do we coordinate at the time the applicant applies to the County for a destruction permit? Outreach activity?	Process will need to be developed. No change to GSP planned.
7	Kchauhan	2.4.6	2-32	Fresno County has adopted well construction permitting programs consistent with the DWR Well Standards. Many surrounding counties have adopted more stringent groundwater management ordinances which include monitoring and reporting requirements and meters for new wells. This was done in an attempt to stop the bleeding and is likely something that is needed in Fresno County. Is this an ongoing discussion with the County to try to get an ordinance that at least has requirements for new wells drilled within the County?	GSAs to continue working with the County. No change to GSP planned.
8	Kchauhan	App 2A	after 2-46	The outreach plan identifies materials available on the website and for distribution. Based on feedback I have received, a brochure/handout on water balance might be needed as well as the diagram showing the MO/MT/URs so people understand the difference and the fact that the URs would never (in theory) be met.	Outreach Committee to discuss. No change to GSP planned.
9	Kchauhan	App 2A	after 2-46	A brochure/handout from Fresno County or City planning departments describing the process for getting new developments approved might be helpful. People tend to think new development/developers are "stealing" water from the private well owners/utilities when in reality, the new development has to bring water for the project. This is a complex process but some simple handout outlining the general process would help people to understand.	Outreach Committee to discuss. No change to GSP planned.
10	Kchauhan	3.1.9	3-22	References the Department of Health Services (DHS) and should reference the State Water Resources Control Board - Division of Drinking Water. All data previously available from DHS was transferred to DDW in July 2014 when the merger occurred.	We should actually be referencing DWR Bulletin 118 for this. Reference has been changed to DWR Bulletin 118.
11	Kchauhan	3.2.5	3-57	Reference the Division of Drinking Water rather than Drinking Water Division.	Change has been made.
12	Kchauhan	3.2.5	3-57	See comment no. 2 - monitoring is based on PWS classification and the size of the community.	Change has been made.
13	Kchauhan	3.2.5	3-57	Indicates some of the constituents of concern are caused by humans. We might consider indicating some of the COCs have point sources and others are naturally-occurring.	Change has been made.

14	Kchauhan	3.2.5	3-57	Discussions regarding the MCL for nitrate should reference the NO3 as N MCL of 10 mg/L rather than the 45 mg/L nitrate as NO3 MCL. DDW switched the monitoring requirements in 2016 to receive all nitrate monitoring results in the nitrate as nitrogen format and bases compliance with the MCL on the MCL of 10 mg/L (as N). Post 2016, the public water quality database will not have any nitrate as NO3 results reported.	Change has been made.
15	Kchauhan	3.2.5	3-58	DBCP: City of Clovis has wellhead treatment for removal of DBCP. Also, the Cities of Fresno and Clovis have petitioned DDW for removal of wellhead treatment due to levels of DBCP being consistently less than half the MCL. DDW has a procedure for evaluating these requests and has granted permission to remove treatment for DBCP from several wells over the years. Many of these same wells are now impacted by 123-TCP.	This description has been added.
16	Kchauhan	3.2.5	3-58	Indicates the MCL for 123-TCP was effective January 1, 2018. The MCL was effective 12/14/17 and monitoring commenced during the first quarter of 2018.	Change will be made to GSP text.
17	Kchauhan	3.2.5	3-59	Indicates the City of Fresno has treatment on its wellheads for TCP. Fresno has some sites that are treating for TCP but they have several wells out of service due to TCP levels in excess of the MCL. We should clarify because not all sites have wellhead treatment at present. We should confirm with Clovis whether or not there are any wells with TCP treatment in place.	Change will be made to GSP text.
18	Kchauhan	3.2.5	3-60	Indicates it is anticipated that more Clovis and Fresno wells may require treatment in the future due to 123-TCP. I think we can revise this section given we have more information on the number of sources/public water systems with TCP MCL violations since initial monitoring is completed. Do we want to be more specific on the TCP impacts in the basin?	Change will be made to GSP text.
19	Kchauhan	3.3.6	3-98	Indicates the NKGSA subsurface outflows are estimated to be 122,000 AF/Year. This does not include the outflow expressed by the Madera sub basin of 60000 AF/year. Does this need to be reevaluated?	There are concerns with Madera modelling effort and estimations. No change to GSP at this time.
20	Kchauhan	4.2.1.1	4-4	References Section 2 Basin Setting (of the GSP). Should this be changed to reference Section 3 - Basin Setting?	Change made.
21	Kchauhan	4.2.2.3	4-11	This section acknowledges some shallow wells will likely go dry prior to water levels reaching stabilization. Is this an appropriate area to state that the NKGSA started performing an impact analysis to determine which sources would likely go dry but given the quality of the data, this analysis has been delayed but will continue after GSP adoption. The results of the impact analysis will be shared in the annual updates required by SGMA.	GSP will changed to include domestic well impact analysis in Section 4.2.2.3.
22	Kchauhan	4.4.1.1	4-24	Indicates the occurrence of an undesirable result to be defined as 15% of the representative monitoring wells having reached either of two criteria for two consecutive years at the same wells. Is there some reason why 15% of the wells was used as the metrics? Depending on the historical data and the COC, an increase in the levels at a particular source will be evaluated immediately. We might consider making this section more consistent with Title 22, CCR monitoring criteria specifically in regard to confirmation sampling and increased monitoring. The NKGSA could review the data as it becomes available. We should try to ensure that the owners of the monitoring wells are submitting the results to our DMS as there can be issues with the State's database used for water quality. Additionally, most of these constituents (with the exception of nitrate) are only monitored every 3 or 6 years so we would never have two consecutive years of data for any constituent except nitrate unless the well already exceeds a drinking water	GSP will be changed on 4-32.

				standard. if there is wellhead treatment, the raw water monitoring frequency is typically once every three months.	
23	Kchauhan	4.4.1.1	Table 4-6	This table should reference the nitrate MCL as nitrate as N (10 mg/L).	Change made.
24	Kchauhan	4.4.1.2	4-25	See comment 22	GSP will be changed on 4-32.
25	Kchauhan	4.4.1.3	4-26	References UR determination being based on multiple monitoring locations within the NKGSA over consecutive years. What does this mean? Is there an internal document that better defines what would constitute a UR? Should the GSP include historical monitoring results for all of the proposed monitoring wells? two year of data, levels trending up?	No additional document. Updates will be included in annual reporting. No changes to GSP planned.
26	Kchauhan	4.4.2	4-26	References using publicly available groundwater quality data. This data is often difficult to track down especially for the SDACs and non-community water systems. I also feel like we need GW level measurements from each well when the groundwater quality samples are collected. We want to be able to fully evaluate causes for changes in concentrations in the COCs.	GSP text will be updated.
27	Kchauhan	4.4.2.6	4-29	references an annual review of the gw quality data. See comment 22. Do we want to establish an agreement with the owners of the wells to have data pulled every year for all of the COCs? If not, we will be able to evaluate the nitrate levels annually. We should also get GW level results.	GSP will be changed on 4-32.
28	Kchauhan	4.4.2.6	Table 4-7	We should consider not using sources for non-community water systems as the only COC monitored for at these wells is nitrate, especially if there isn't a CWS well in the section. Wells Nos. 1000552-001, 1000492-001, 1000097-001 are all noncommunity wells and we will only get nitrate results from these wells.	GSP text will be updated.
29	Kchauhan	4.4.2.6	Table 4-7	Monitoring well no. 1000248-001 will not be an available source as the Double L MHP is being connected to the City of Kerman and the well will be destroyed as part of the funding project. Should we ask the SWRCB about using this well as a monitoring well rather than having it destroyed?	GSP will be updated to reflect changes in monitoring network.
30	Kchauhan	4.4.2.6	Table 4-7	Washington Colony School (1000285-053) is designated as an inactive water system. Confirmed with DDW that this PWS is no longer active and the School is served by the Washington Union High School system. This monitoring well should be removed from the network.	Table will be updated accordingly.
31	Kchauhan	4.4.2.6	4-29	Should we establish a contingency for using data from a nearby source if a source is offline at the time of sampling?	GSP will be changed to state that if for some reason a well is not available to be monitored, a well in the same general location and of similar construction will be used, and that the GSA will work with the agencies to establish a backup location.
32	Kchauhan	5.5.6	5-21	We should be aware that relying on other utility's data is a risk. We are vulnerable to improper sampling procedures. Perhaps we want to build in a contingency that state if the PWS data shows a level of a COC in excess of the MCL or not inline with the historical results, then we would start an independent sampling procedure? Let's discuss.	GSP will be changed to state that data will be analyzed as it comes in and will coordinate with DDW and the PWS on any results that do not appear to be accurate to investigate possible causes for the abnormal results.
33	Kchauhan	5.5.6	5-21	To fully evaluate changes in concentration levels at our representative monitoring wells, we should consider getting additional information during sampling events. Data like pumping rate, pumping data, water level data would be helpful in evaluating changes in water quality.	GSP text to be updated.
34	Kchauhan	6.3.2	6-15	WH-2 Should we engage the County about strengthening their wellhead ordinance to be more consistent with other wellhead requirements in neighboring counties for new wells? Things like requiring a meter and reporting as a condition of getting a permit for a new well would be helpful to keep from exasperating the problem. Other counties like Merced County	GSAs discussions with County to continue. No planned change to GSP.

				and Madera County have more stringent requirements for new wells and require meters be installed for new wells. They also require more monitoring for new domestic water wells.	
35	Kchauhan	General	General	Should we establish baseline levels for the various representative monitoring wells for each of the COCs? Documenting the historical levels will be critical for evaluating changes in water quality. I am not sure which section it makes the most sense to include this information in.	GSP text to be updated.
36	Kchauhan	7.4	7-3	Should the DMS also have the ability to store the water quality monitoring results whether the results are obtained from public data or from monitoring we do directly to confirm increased concentrations at specific monitoring wells.	Not planned on this time for the basin. May be existing options available so GSA should continue to evaluate with others in the basin. No changes to GSP planned.
37	Kchauhan	4-30	Table 4-7	Should reference tetrachloroethylene (PCE) rather than perchloroethylene.	Yes we should. Change has been made in Table 4-6. Change to be made in Table 4-7 as applicable.
38	kchauhan	4-30	Table4-7	Source no. 1000023-001 does not exist. The only source of supply listed in the state's database is source no. 013 so we should consider using source no. 013 since it would be a regularly used source.	Table will be updated for source no. 13.
39	Kchauhan	General	General	Should we consider changing our water quality COC from uranium to gross alpha/uranium being that uranium monitoring is triggered when GA is greater than 5.0. If GA is less than 5.0 then we won't have a uranium analysis result. Also, we should note that the monitoring frequency for GA for some sources is one sample per nine years. For most of the sources, we will get very limited data. Might be challenging to use GA/Ur as a COC given the limited data we will receive.	GSP text to be changed.
40	Kchauhan	4-30	Table 4-7	Source no. 1010007-102 does not have any water quality monitoring results in PDWW since 2017. Has this well been offline? Future plans? Should we consider selecting another source within the general area to serve as the representative monitoring well? See comment No. 31.	Update to monitoring network to be made in GSP.
	P&P	Throughout	Through out	Change drought references from 2011-2015 to 2012-2016	Change made.

Public Comments Table. - Review of NKGSA 8-15-19 DRAFT GSP

No.	From	Section	Page	Comment	Response
1	California Rural Legal Assistance, Inc.	3 2	3-57 2-20 2-18 2-18	**The NKGSA Basin Setting Chapter Fails to Adequately Identify Contaminant Sites and Plumes** The Sustainable Groundwater Management Act (SGMS) mandates that GSAs include a "Basin Setting" section in the GSP that provides an overview of the groundwater conditions in the Subbasin. This section must include "groundwater quality issues that may affect the supply and beneficial uses of groundwater, including a description and map of the location of known groundwater contamination sites and plumes." 23 CCR 354.16(d). The NKGSP contains information on some groundwater contaminant sites and plume locations (GSP p. 3-57) but fails to include any rural communities that have water contamination and are unserved by a public water system. The plume location map presented on page 2-20 fails to identify any groundwater plume locations outside of the Fresno metropolitan area. Nor are plumes outside of the Fresno metropolitan area discussed elsewhere in the GSP. The GSP states that "similar maps for the rest of the NKSA are not known to exist." (GSP p. 2-18) There is no evidence of any further effort to identify plumes in other locations, despite the NKGSP acknowledging that "maintaining a current map of known plumes is important for the regions." (GSP p. 2-19) Maintaining a current map of known plumes is necessary to comply with North Kings GSA's obligations to address groundwater quality issues, including plume migration. These legal obligations are not contingent on the availability of preexisting maps. North Kings GSA should develop additional plume maps, or include information on contaminant plumes outside of the Fresno metropolitan area from other sources. The groundwater quality basin setting also fails to identify contaminant sites affecting domestic well users by focusing solely on public water systems for contaminant information. There are a substantial number of contaminated domestic wells and domestic well clusters throughout the Kings Subbasin that are not reflected in the draft GSP. The draft GSP states that "in some small communities, many domestic wells exceed water quality standards and residents continue to use the water due to lack of alternatives," (GSP p. 2-18) yet provides no further information on these communities. These individual communities and domestic well clusters must be included by name or location in the NKGSP and their contaminant levels identified. The NKGSP must address drinking water quality issues for domestic well users, and it is unlikely that the North Kings GSA will do so if the GSP does not even identify the communities in need of assistance. The North Kings GSA must make a dedicated effort to locate information related to contaminant plumes and sites in rural communities. Sources of such information include but are not limited to: domestic well testing results conducted by residents, community organizations, or technical assistance providers, funding application for water infrastructure related to groundwater remediation, or through new investigatory efforts. The North Kings GSA may develop new monitoring wells in rural communities or install monitors on existing domestic wells if insufficient data exists to identify contamination in rural areas.	The NKGSA has developed voluminous data and will continue to develop more data for evaluating and implementing the GSP.

2	California Rural Legal Assistance, Inc.	4	4-5	**The North Kings Groundwater Sustainability Plan Must Protect the Interests of Domestic Well Users and Disadvantaged Communities** *a. SGMA mandates that all beneficial users be represented* Groundwater Sustainability Agencies (GSAs) are required to consider the interests of all users of groundwater, specifically including domestic well owners and disadvantaged communities reliant on groundwater; the interests of these users must be protected throughout the development of the GSP. Water Code 10723.2(a)(2); 10723.2(i); CCR 354.26. The obligation to protect the rights of domestic well owners and disadvantaged communities is not secondary to the protection of other beneficial users such as industrial, agricultural, or commercial groundwater users; the rights of domestic well owners and disadvantaged communities must be given the same weight as these other users and policies and management actions within the GSP must reflect that equality. *b. The NKGSA fails to adequately address the needs of domestic well users and disadvantaged communities.* The NKGSP fails to provide sufficient protections to domestic well users and disadvantaged communities. The GSP does not identify or address the specific needs and water issues affection domestic well users and disadvantaged communities except in passing, and includes no policies or projects designed to specifically protect these beneficial users' groundwater resources. The NKGSP minimum thresholds for groundwater elevation fail to address the rights of domestic well users. The minimum threshold is set by identifying the lowers groundwater levels expected by a five-year drought, rather than by identifying the levels necessary to sustain residential water users. The minimum threshold on many wells identified in the NKGSP is set below the average well depth for domestic wells throughout the Subbasin. Even the measurable objective for some wells is below the depth of most domestic wells. Domestic well users are typically low-income residents, a group specifically identified for protection in SGMA, that lack the necessary resources to drill a deeper well to reach groundwater once aquifer levels decline—resources that many agriculatural, industrial, and commercial users possess. Setting the minimum thresholds lower than average domestic well depth ensures that many wells will fail while the aquifer levels are still considered "sustainable." The NKGSP deals with this issue dismissively by stating that SGMA does not require the GSA to maintain current water levels or prevent any wells from going dry. Rather, the GSA is required to stabilize and correct groundwater decline. Until water levels have been stabilized and the basin has reached sustainability, the GSA does not view a well going dry as an undesirable result (GSP p. 4-5) The North Kings GSA demonstrates that it does not take its legal obligation to protect all beneficial users seriously by summarily dismissing well failures as an undesirable result. Well failures are the most significant negative result from groundwater changes that impacts residential well owners and disadvantaged communities. These residents simply do not have the resources to address this issue individually. The North Kings GSA should set groundwater level minimum thresholds that will protect residential well owners by being equivalent to or higher than average domestic well depths to comply with its legal obligations under 23 CCR 354.26. The NKGSP fails to include any projects or policies aimed at assisting domestic well owners whose wells are at risk of failure or have failed. These policies must be included, especially if North Kings GSA sets minimum thresholds below the depths of residential well; they must be concrete and measurable. Examples of such policies include restriction on pumping near communities reliant on domestic wells to slow groundwater depletion in the aquifers these communities rely on, funding programs to assist domestic well owners in drilling deeper wells, and measuring and tracking domestic well levels to identify areas of dewatering that should be addressed. Priority should be given to recharge projects near domestic well communities to recharge the aquifers these users rely on.	The NKGSA has developed voluminous data and will continue to develop more data for evaluating and implementing the GSP. GSP changed in 4.2.2.3 to discuss analysis of the impacts of the water level measurable objectives and minimum thresholds on domestic wells. GSP changed in 4.2.2.3 to discuss analysis of the impacts of the water level measurable objectives and minimum thresholds on domestic wells. GSP changed in 4.2.2.3 to discuss analysis of the impacts of the water level measurable objectives and minimum thresholds on domestic wells. The NKGSA has developed voluminous data and will continue to develop more data for evaluating and implementing the GSP.
3	California Rural Legal Assistance, Inc.			**The Groundwater Sustainability Plan Fails to Adequately Protect Drinking Water Quality** *a. Protection of groundwater quality is a mandatory component of SGMA* SGMA mandates that GSAs adopt policies, plans, and projects in their GSP that protect against six undesirable results, including degraded groundwater quality. Water Code 10727.2(d). GSAs must specifically protect against "significant and unreasonable degraded water quality, including the migration of contaminant plumes that impair water supplies." Water Code 10721 (x). The legal mandate to prevent degraded groundwater quality is of equal importance to the other five sustainability indicators, and North Kings GSA must address groundwater quality degradation with proactive, substantial efforts. *b. The NKGSP fails to adequality identify groundwater quality issues* The NKGSP fails to adequately address water quality issues by failing to adequately identify contamination throughout the Subbasin. The NKGSP states that the GSA will use monitoring wells from public water agencies to evaluate the water quality for the Subbasin, excluding domestic well contaminant levels (GSA p. 4-21). North Kings GSA's reliance on data from public water systems will exclude critical information about the location and severity of groundwater contamination and risks misrepresenting the contamination in the aquifer. Many domestic wells in the Kings Subbasin contain high levels of contaminants such as nitrates, sometimes much higher than the state Maximum Contaminant Levels (MCLs). Public groundwater wells are often	Thank you for your comments. All comments are given due consideration. The NKGSA has developed voluminous data and will continue to develop more data for evaluating and implementing the GSP.

				deeper than private water wells; water drain from deeper wells often contains lower levels of the contaminants that impact domestic wells. The severity of these contaminants will not be reflected in the NKGSP unless data from private wells is included in the plan. Creating a monitoring network based on the location of existing public water systems without including the location of groundwater contaminant plumes will result in a data set that fails to accurately represent water conditions throughout the Subbasin. Public water systems are not located	Thank you for your comments. All comments are given due consideration.
			4-21	throughout all rural areas in the Subbasin; thousands of acres of land will lack data showing water quality or contaminant plumes. The current GSP proposes using two water quality monitoring wells in each township, (GSP p. 5-19), but this is insufficient to represent water quality variations in large rural areas such as Fresno County. Smaller contaminant plumes exist in various areas in the Subbasin are not reflected on the contaminant plume map (see Section 1, above) despite having a significant detrimental public health effect on residential well users. For example, domestic well users adjacent to the community of West Park have high levels of nitrates; DBCP and Uranium have also been identified in the water. Because those residents are reliant on domestic wells, and the community water system serving West Park has no wells in the area, the contamination is not reflected anywhere in the GSP. Adequate mitigation measures and projects to address domestic well contamination cannot be developed if the contamination is not even recognized in the plan. A higher density monitoring system that includes wells near or in domestic well communities must be utilized. *c. The undesirable result standard for groundwater quality must be revised* The NKGSP "undesirable result" for groundwater quality fails to protect human health and the needs of domestic well owners and disadvantaged communities. The GSP defines and undesirable result for groundwater quality as 15% of the representative monitoring wells experiencing degradation of water quality to below MCLs, or a statistically significant increase in groundwater degradation in areas where contamination has historically been above MCLs. At least one of these conditions must be met for two consecutive years before the GSP will consider the situation an undesirable result.	Thank you for your comments. All comments are given due consideration.
			5-19	This standard for identifying undesirable water quality results is insufficient and must be more protective of human health. It is inappropriate for the GSP to wait two years before water quality degradation triggers an undesirable result classification. This approach delays development and implementation of mitigation measures to address the contamination, further endangering public health by delaying the overall time for the aquifer to return to drinkable standards. The impact of this will especially be felt by domestic well users that do not have the same protections and infrastructure to address water quality as users of public water systems, which will be required to address contamination issues expeditiously. It is also inappropriate to require 15% of monitoring wells to reflect the same degradation of water quality before and unreasonable result classification will be triggered. Monitoring wells in rural areas are few and distant from each other and water quality can vary significantly in different areas. The 15% threshold requirement may result in substantial groundwater degradation being unrecognized as an undesirable result simply because monitoring wells are located far apart and can therefore not meet the 15% requirement. Water degradation at a single well should be sufficient to trigger an undesirable result classification, especially in rural areas where monitoring wells are sparse. The North Kings GSA must take additional steps to address these issues. Additional well monitoring must occur in rural areas to present a more accurate picture of groundwater contaminant plumes and to gather data on contaminant levels. The monitoring network must include shallow wells that are reflective of domestic water systems. The triggering time period to reach an undesirable result for groundwater quality must be shortened. The number of wells that must be affected by contamination before an undesirable result classification is triggered must be reduced dur to the rural nature of the Subbasin. *d. The NKGSP fails to utilize available tools to address groundwater quality degradation* The North Kings GSA fails to fully exercise its authority to address groundwater contamination issues in the Subbasin. The NKGSP states that the North Kings GSA will simply monitor annual public reporting on groundwater quality and does not commit to any proactive actions to address groundwater quality issues. The NKGSP also states that the only authority the North Kings GSA possesses to address groundwater contamination is to "regulate and manage groundwater pumping." (GSP p. 4-23). This is inaccurate. The North Kings GSA has the power to register and monitor domestic wells and should utilize this power. The NKGSP identifies a data gap for the water quality of domestic wells yet proposes no plans or programs to address this inaccuracy. Collecting data from private wells is a critical first step towards complying with the North Kings GSA's legal obligations to prevent worsening groundwater quality throughout the Subbasin. The North Kings GSA should develop voluntary or mandatory private well monitoring programs or drill additional monitoring wells throughout the area to address the data gaps. The North Kings GSA has additional powers. Proposed projects can be designed and implemented in a manner that is protective of groundwater quality. Recharge projects should include soil testing to ensure that groundwater recharge does not unintentionally cause additional contaminants	GSP changed on page 4-32, to state that actions may be conducted as adverse water quality changes are observed to prevent an undesirable result. GSP changed on page 4-32, to state that actions may be conducted as adverse water quality changes are observed to prevent an undesirable result. The NKGSA has developed voluminous data and will continue to develop more data for evaluating and implementing the GSP. Thank you for your comments. All comments are given due consideration.

				to leach into the aquifer, worsening contamination. This is especially true for on-farm recharge projects where fertilizers and other agricultural chemical products may have been used. Recharge should be prioritized in areas where the specific contaminants would be reduced by increasing water levels. Domestic well quality data can be gathered and tracked to identify additional plumes in the Subbasin that are not currently reflected in the Fresno Metropolitan plume map. Additional contaminant monitoring can be added to irrigation wells already being regularly tested. The North Kings GSA must use the full extent of its powers in proactive and creative ways to address groundwater quality issues for disadvantaged communities and users of domestic wells; these communities are the most highly impacted by groundwater contamination and are specifically protected under SGMA.	Thank you for your comments. All comments are given due consideration.
4	John Ulam (undated letter)			Puzzled by the fact that not many of my neighbors have been informed about SGMA. No immediate neighbors knows anything about it. At the meetings Gary Serrato indicated that two and five acre parcels are to be restricted to pumping two acre feet annually. This thought process is unfair to five acre parcel owners. 1. While two acre feet for a two acre parcel is fair, two acre feet for five acres is not. I have developed my five acre parcel with a vineyard, fruit trees, landscaping and a goat herd. I am more than willing to remove grass etc. to save water, but letting trees die? Don't scientists agree that trees recycle carbon and many say we have a climate change problem. 2. Also addressing a comment from a county representative at the September meeting in Clovis stated that an acre of open land can capture an acre feet of water annually, at normal rainfalls totals, approximately 12 inches. Therefore, I believe that I should be able to pump five acre feet annually, owning a five acre parcel. 3. If a property owner such as myself has a catch basin on the natural swale or low areas to capture and percolate winter runoff, can that increase pumping allowed in the summer? I believe this should be taken into consideration. 4. Another consideration that could be looked at is that a landowner that has no landscaping, trees or animals could be allowed to either sell or give their unused pumping allotment of water to their neighbors? 5. Contrary to what was stated at the September meeting in Clovis, forty acre parcels are being subdivided in this area with no new water sources. One was divided at the 11,000 block of East Herndon. Others are also being considered in the Academy/Shaw area. In closing we can see that the State of California seems to be contributing to this overdraft by taking away more surface water for "environmental" reasons, even in very wet years. No new dams are being allowed, even, the raising of Shasta Dam is stopped in the courts. It is of my opinion that members of the NKGSA board should be of this area we live in to represent us properly. I believe this letter represents the position of most residents in this area that are more than willing to protect the ground water and do their part, but do no want meters forced onto them along with all the fees that will come with it.	Thank you for your comments. All comments are given due consideration.
5	Katharine Wilson			Cannot be at Thursday Sept 12 meeting. Questions: Will you (GSA) ignore water rights?	Thank you for your comments. All comments are given due consideration.
6	Robert Havay	6		1. No provision to build/repair ground water storage. 2. Moratorium on building new housing. The explanation developers must submit plan for "new water source" is disingenuous. 3. Page 47, $600 Installation fee for well meter plus $300 annual. If I am restricted by meter on usage or charged for how much water I use then the $300 annual fee becomes a cash cow for the state. 4. Limits of 55 gal per person per day-what's that all about?	Thank you for your comments. All comments are given due consideration.
7	Diana Curtis	7		I am opposed to more government intervention. This is only a Stepping stone to a meter on our well on our property. We paid for the well and the electricity to pump water. If something goes wrong with the well we have to pay for it. There is no maintenance involved as in public water supply. Bad idea.	Thank you for your comments. All comments are given due consideration.
9	Brad Lopez	4		The comments contained in this document are taken for the 2 April 2019 email sent to Adam Claes, North Kings GSA, Fresno Irrigation 2907 S Maple Ave, Fresno, CA 93725 Please include the following written recommendations and comments in the 12 September 2019, 6-8PM meeting tonight, the notes and protocol at the Clovis Veterans Memorial. Comment #1 Measures for landowners within SIGMA Action: Amend the GSP draft to include current homeowner with wells permanent exemptions for those who have made useful, practical,	Thank you for your comments. All comments are given due consideration.

				sustained installation/modifications to measurably retain water to recharge the groundwater. Examples for Landowners: a) Install and maintain adjustable levies to increase sizable sustainable ground water. b) Excavate and create water basins in property safe areas to catch and retain water to percolate and constantly recharge aquifers. c) Change existing landscape to drought resistant plants and trees to minimize water use. Retain existing trees to absorb carbon dioxide from the atmosphere. Comment #2 Measures for the California State Legislature and Governor specified in SIGMA Action: Urge and implore the California State Legislature and Governor to enact legislation to increase sustainable water to divert and restore water in counties to regenerate aquafers throughout the San Juaquin Valley. Examples for state legislators and governor: a) Build a dam near the San Francisco Bay Area to prevent brackish salt water backflow into the Delta. b) Along with the new dam divert 70-80% more water to the California Aqueduct to prevent the reprehensible annual waste of millions of acre feet of fresh water that goes through the Bay Area into the Pacific Ocean. c) Create more aqueducts to supply fresh water to farmland with the most need to increase food production, reverse unemployment, and save indigenous wildlife and fauna. d) Implement regulations to establish very large fines for any and all entities that discharge any material in or near the Delta and the San Francisco Bay that contributes to poor water quality. Close any and all violators and businesses with three violations that harm water quality.	
10	Pinedale County Water District	2	13	Page 2-13 Description of Pinedale County Water District While almost all of the district is in fact located in the City of Fresno, the description of the Pinedale County Water District should be amended to include that there are parts of the District that remain in the unincorporated County. The area served by the District for water service is approximately 886 acres, not 850, which includes approximately 120 acres of unincorporated land located in County of Fresno (three county islands). This means that more than 90% of the water pumped by Pinedale is delivered to and for the benefit of residents and businesses in the City of Fresno with the small amount of water being delivered to the County islands de minimis. This overlap with the City of Fresno raises substantial concerns about groundwater management within the District which includes but is not limited to: ability of Pinedale to engage in recharge activities within the District, how credits for recharge activities will be apportioned between the City of Fresno and the District, the extent that City of Fresno and Pinedale groundwater supply, demand, and recharge activities are intertwined and the impacts of the City of Fresno's land use planning and issuance of development entitlements have had Pinedale's groundwater use, supply and ability to recharge groundwater supplies including the development and utilization of CO2 basin located within Pinedale's boundary. The City of Fresno is currently denying Pinedale the use of basin CO2 for groundwater recharge. These issues must be addressed in the GSP, particularly as these issues related to Projects and Management Actions as described in the GSP. If these issues are not addressed and resolved in the GSP prior to approval, the GSP will be inadequate and subject to legal challenge.	GSP will be changed to reflect 886 acres. Thank you for your comments. All comments are given due consideration.
11	Pinedale County Water District	2	36	**Page 2-36 Description of Municipal and Industrial Well Operators** States that "[w]hile Malaga and Pinedale CWD's meet SGMA eligibility criteria as a GSA, the governing bodies for these local agencies elected to be represented in the North Kings GSA by Fresno Irrigation District and the City of Fresno, respectively." This statement as it relates to the Pinedale County Water District is completely false and not supported by the record. First, while it is true that Pinedale meets the criteria to be a GSA, Pinedale did no elect to become a GSA therefor, by default, it is part of the North Kings GSA. Second, at no time did the Board of Directors of the Pinedale County Water District elect to be represented by the City of Fresno nor does the City of Fresno have any authority to represent the Pinedale County Water District or its interests on the North Kings GSA board, other than its duty as a member of the North Kings GSA to act in the best interest of all of those within the jurisdiction of the North Kings GSA.	GSP will be changed to clarify that Pinedale elected to not be on the NKGSA board.
12	Pinedale County Water District	6	2	The GSP identifies several projects being undertaken by the member agencies and entities individually but the GSP fails to identify any policy or mechanism for the development of multi-agency basin-wide projects that NKGSA members and non-members and stakeholders could participate in for the benefit of the entire basin or north-kings sub-basin. The GSP should include a policy that encourages regional groundwater recharge projects facilitated by the NKGSA which non-members and other stakeholders could participate in to take advantage of the economies of scale provided by such projects as opposed to individual agencies being required to engage in individual groundwater mitigation/recharge projects.	Thank you for your comments. All comments are given due consideration.

13	The Nature Conservancy	2.5.1	2-35	Environmental and Ecosystem Interests were listed as Beneficial Users of groundwater. Surface water users were also listed as Beneficial Users, as long as there is hydrologic connection between surface water and groundwater bodies. No further description of the environmental or ecosystem interests or surface water users was given. The Kings River Fisheries Program and the San Joaquin River Restoration Program (SJRRP) are described in Section 2.2.2 (Limits to Operational Flexibility). The Kings River program includes year-round flows, improved temperature control, and monitoring requirements. The SJRRP program also increases flows to benefit fisheries. The benefits and requirements of these programs should be discussed here. Please describe whether other beneficial uses and users of groundwater in the NKGSA area are present, including protected Lands, preserves, refuges, conservation areas, recreational areas; managed wildlife areas, and other protected lands; and Public Trust Uses, including wildlife, aquatic habitat, fisheries, and recreation. The types and locations of environmental uses, species and habitats supported, and the designated beneficial environmental uses of surface waters that may be affected by groundwater extraction in the NKGSA area should be specified. To identify environmental uses and users, please refer to the following: • Natural Communities Commonly Associated with Groundwater dataset (NC Dataset) - https://gis.water.ca.gov/app/NCDatasetViewer/ • The list of freshwater species located in the Kings Subbasin in Attachment C of this letter. Please take particular note of the species with protected status. • CDFW's CNDDB - https://www.wildlife.ca.gov/Data/CNDDB • USFWS's IPAC report for the NKGSA area -https://ecos.fws.gov/ipac/	Thank you for your comments. All comments are given due consideration.
14	The Nature Conservancy	2.2.1	2-16 to 2-17	Groundwater Level Monitoring (p. 2-16) programs have been implemented by the Fresno Irrigation District since 1920. They collect data from other irrigation districts and agencies and prepared annual reports. Most of the agencies within the North Kings GSP were formerly part of the Fresno Area Regional Groundwater Management Group. The Kings River Conservation District (KRCD) also collects water level data in the NKGSA area. Please describe how existing groundwater monitoring programs are protective of GDEs or propose additional monitoring that specifically targets GDEs. The Surface Water Monitoring section (p. 2-17) briefly describes the types of monitoring by the Fresno Irrigation District, Kings River Water Association (KRWA), the Friant Water Authority, the cities of Fresno and Clovis, and other water districts. There is no mention of ISWs or GDEs and how they are monitored. Please explain the relationship of existing stream flow monitoring to the protection of ISWs and GDEs.	Thank you for your comments. All comments are given due consideration.
15	The Nature Conservancy	2.2.2	2-18 to 2-23	The SJRRP requires the release of flows from Friant Dam to the confluence with the Merced River to support the life-stages of salmon and other fish. These restoration flows will allow more groundwater seepage when the system is fully operational, which is estimated to be after 2029. Table 2-3 (p. 2-22) lists potential impacts in reduced water deliveries from the San Joaquin River. This section should discuss or reference any instream flow requirements, especially flow needs for critical species, including the amount, time of year when the flow minimum is specified, the duration, the species for which it applies, associated permits that set forth the requirements, and the regulating agency setting forth the compliance requirements. Please discuss the potential impact of the SJRRP on the aquatic species and habitat present along the river and within adjacent habitats supported by the river.	Thank you for your comments. All comments are given due consideration.
16	The Nature Conservancy	2.3	2-24 to 2-28	There are three city general plans (Fresno, Clovis, and Kerman) and the Fresno County General Plan within the NKGSA area. All were completed prior to the development of the GSA. The plans should be modified to include a discussion of General Plan goals and policies related to the protection and management of GDEs and aquatic resources that could be affected by groundwater withdrawals. Please include a discussion of how implementation of the GSP may affect and be coordinated with General Plan policies and procedures regarding the protection of wetlands, aquatic resources and other GDEs and ISWs. This section should identify Habitat Conservation Plans (HCPs) or Natural Community Conservation Plans (NCCPs) within the NKGSA area and if they are associated with critical habitat, GDE or ISW habitats. Please identify all relevant HCPs and NCCPs within the NKGSA area and address how GSP implementation will coordinate with the goals of HCPs or NCCPs. Please refer to the Critical Species Lookbook to review and discuss the potential groundwater reliance of critical species in the basin. Please include a discussion regarding the management of critical habitat for these aquatic species and their relationship to the GSP.	Thank you for your comments. All comments are given due consideration.

17	The Nature Conservancy	2.3.4	2-27 to 2-28	Please include a discussion of how future well permitting will be coordinated with the GSP to ensure achievement of the Plan's sustainability goals. The State Third Appellate District recently found that counties have a responsibility to consider the potential impacts of groundwater withdrawals on public trust resources when permitting new wells near streams with public trust uses (ELF v. SWRCB and Siskiyou County, No. C083239). The need for well permitting programs to comply with this requirement should be stated in the text.	GSP changed in 1st paragraph of 6.1 to include… The NKGSA will also be an active participant and reviewer of proposed project impacts through the project development and CEQA process.
18	The Nature Conservancy	2.4.4	2-32	The County of Fresno has the authority to require permits for well abandonment and/or well destruction, but due to staffing and funding limitations the GSP notes that enforcement of this requirement is limited. The Cities of Clovis and Fresno also require that wells be properly destroyed within their city limits. Please describe what actions will be taken by the NKGSA to make sure that wells are properly abandoned. The GSP also states that well owners will be encouraged to convert the wells into monitoring wells. Please include text to clarify that only wells screened in one aquifer and are appropriate for monitoring will be included in the monitoring program.	Thank you for your comments. All comments are given due consideration.
19	The Nature Conservancy	3.1.7	3-14	Basin wide cross sections provided in Figures 3-7 through 3-12 (pp. 3-15 through 3-20) are regional, and do not include a graphical representation of the manner in which shallow groundwater may interact with ISWs or GDEs that would allow the reader to understand this topic. The cross-sections have been taken from a 1969 source and as reproduced in the GSP, are very difficult to read and understand. Please reproduce the regional cross-sections so that they can be understood by the reader and update them to illustrate data obtained from more recent well installations. Include an example near-surface cross section that depicts the conceptual understanding of shallow groundwater and river interactions at different locations, as well as any potential GDEs.	Thank you for your comments. All comments are given due consideration.
20	The Nature Conservancy	3.1.8.1	3-21 to 3-22	The first aquitard is the extensive iron-silica hardpan layer of the Riverbank Formation, which is important in identifying where groundwater recharge can occur. The text states later in this section that the two clay layers, A and C clays are not present in the NKGSA area (p. 3-22). The E-clay, commonly known as the Corcoran Clay, is present in the western part of the NKGSA area and confined conditions exist below the Corcoran Clay. In the past, it was assumed that only one aquifer existed in the eastern part where the E-clay is absent. However, this assumption is being reevaluated. KDSA has described in Appendix 3A how locally extensive clay layers can function as an aquitard, forming a confined aquifer below. This evaluation will continue and NKGSA stated later in Section 5 that the confined aquifer may be monitored separately in the future. Please discuss the importance of clearly defining which aquifer any given well is monitoring. Wells monitoring the unconfined aquifer measure the true water table and these elevations should be contoured separately. These groundwater elevations then help determine representative conditions within GDE units.	Thank you for your comments. All comments are given due consideration.
21	The Nature Conservancy	3.1.8.2	3-26	In the NKGSA area, the base of the usable aquifer corresponds with the base of freshwater, generally defined as groundwater with total dissolved solids (TDS) of 2,000 milligrams per liter (mg/l) (KDSA, 2010), except one area to the east. In the far eastern part of the NKGSA area, the base of the aquifer is defined by the top of the basement complex. As noted on page 9 of DWR's Hydrogeologic Conceptual Model BMP (https://water.ca.gov/LegacyFiles/groundwater/sgm/pdfs/BMP_HCM_Final_2016-12-23.pdf) "the definable bottom of the basin should be at least as deep as the deepest groundwater extractions". Thus, groundwater extraction well depth data should also be included in the determination of the basin bottom. Properly defining the bottom of the basin will prevent the possibility of extractors with wells deeper than the basin boundary from claiming exemption from SGMA due to their well residing outside the vertical extent of the basin boundary.	Thank you for your comments. All comments are given due consideration.
22	The Nature Conservancy	3.1.12	3-40 to 3-41	Wetlands were mapped along the Kings river, San Joaquin River, and several intermittent streams including Redbank Creek, Dog Creek, Pup Creek, and Big Dry Creek, as shown on Figure 3-22 (p. 3-43) as identified from US Forest Service's Wetland Inventory, according to the GSP. In this section, please refer to the discussion of GDEs in Section 3.2.8 and mapped on Figure 3-38. Also, if the Wetland Inventory was in fact the US Fish and Wildlife Service (USFWS) National Wetlands Inventory (NWI), then correct the text and reevaluate the data. The NWI does not always include or segregate separate existing wetlands that are on the periphery of other features. Please describe the wetland types in more detail. If they are truly vernal pools confined by a clay layer then they are not GDEs, but they must meet the criteria of a vernal pool as described by the California Rapid Assessment Methodology or the United States Army Corps of Engineers to qualify.	Thank you for your comments. All comments are given due consideration.

23	The Nature Conservancy	3.2.1	3-45 to 3-49	The NKGSP notes that “The dramatic lowering of hydraulic heads in the confined parts of the aquifer has resulted in a large net downward movement of water through boreholes. This vertical flow occurs in both pumped and un-pumped wells during the growing season” (Faunt, CC ed. 2009) (p. 3-47). Vertical gradients have been measured recently indicating that there are head differences between wells screened above and below the Corcoran Clay in several locations. Please refer to a map in this section to show the locations where the vertical gradients have been measured. Please expand this section to include a discussion of the impacts of vertical flow on ISWs and GDEs.	Thank you for your comments. All comments are given due consideration.
24	The Nature Conservancy	3.2.7	3-75 to 3-79	ISWs are best estimated by first determining which reaches are completely disconnected from groundwater. This approach would involve comparing groundwater elevations with a land surface Digital Elevation Model (DEM) that could identify which surface waters have groundwater consistently below surface water features, such that an unsaturated zone would separate surface water from groundwater. Please provide or refer to depth to groundwater contour maps in this section. See Attachment D for best practices for completing this step. Specifically, ensure that the first step is contouring groundwater elevations, and the subtracting this layer from land surface elevations from a DEM to estimate depth to groundwater contours across the landscape. This will provide much more accurate contours of depth to groundwater along streams and other land surface depressions where GDEs are commonly found. Contours developed from depth to groundwater measurements at wells assumes that the land surface is constant, which is a poor assumption to make. The regulations [23 CCR §351(o)] define ISWs as “surface water that is hydraulically connected at any point by a continuous saturated zone to the underlying aquifer and the overlying surface water is not completely depleted”. This GSP states that “the location specific data from the SJRRP indicate that there may be connection at some locations. Limited data is available from the DWR from shallow wells on ISW systems along the Kings River where it borders the NKGSA boundary” (p. 3-75). The locations along the San Joaquin River, where shallow wells are available (Figure 3-37, p. 3-77), are described, indicating that the river may be connected during times of high flows. No graphs were included to show the relationship between the depth to groundwater and the river bed. Please provide cross-sections at these locations to show the relationship between the depth to groundwater and the bed of the river channel. Near the Kings River between Highway 180 and Sanger, shallow wells were installed at proposed gravel processing facilities and wastewater facilities by KDSA (KDSA 2017). The GSP states that the “KDSA further indicates that along the reach of the Kings River, upstream of the Reedley narrows, the groundwater is indicated to be in direct hydraulic communication with streamflow in the Kings River” (p. 3-79). The groundwater in this area is shallow based on DWR measurements. This finding needs to be illustrated using cross-sections with measured channel bed elevations and depths to groundwater. Again, please provide a cross-section at this location to show the relationship between the depth to groundwater and the bed of the river channel.	Thank you for your comments. All comments are given due consideration.
25	The Nature Conservancy	3.2.8	3-80	The NC dataset is a starting point for GSAs to identify GDEs in their basin/subbasin. The NC dataset has 1,959 acres of potential GDEs mapped within the NKGSA area, representing a significant amount of GDEs to be considered. Note that this is a starting point and not all potential GDEs are mapped and not all ecosystems mapped are GDEs. Please refer to Attachment D of this letter for best practices for using local groundwater data to verify whether polygons in the NC dataset are supported by groundwater in an aquifer. If insufficient data are available to describe groundwater conditions within or near polygons from the NC dataset, include those polygons in the GSP until data gaps are reconciled by the monitoring network. Specifically, please note: • Figure 3-23 provides groundwater depth contours for Spring of 2017. Please provide more details on how this figure was developed by confirming: ○ that wells monitoring the upper unconfined aquifer are being used to verify whether polygons in the NC dataset are supported by groundwater; ○ the wells used for interpolating depth to groundwater sufficiently close (<5km) to NC Dataset polygons reflect local conditions relevant to ecosystems; ○ the wells used for interpolating depth to groundwater are screened within the surficial unconfined aquifer and capable of measuring the true water table; and ○ depth to groundwater is contoured using groundwater elevations at monitoring wells to get groundwater elevation contours across the landscape. This layer can then be subtracted from land surface elevations from a DEM to estimate depth to groundwater contours across the landscape. This will provide much more accurate contours of depth to groundwater along streams and other land surface depressions where GDEs are commonly found. Depth to groundwater contours developed from measurements at wells assume that the land surface is constant, which is a poor assumption to make. It is better to assume that water surface elevations are constant in between wells, and then calculate depth to groundwater using a DEM of the land surface to create the contour map.	Thank you for your comments. All comments are given due consideration.

				• It is highly advised that seasonal and interannual groundwater fluctuations in the groundwater regime are taken into consideration. Utilizing groundwater data from one point in time (e.g., Spring 2017) can misrepresent groundwater levels required by GDEs, and inadvertently result in adverse impacts to the GDEs. We highly recommend using depth to groundwater data from multiple seasons and water year types (e.g., wet, dry, average, drought) to determine the range of depth to groundwater around NC dataset polygons. Ensure that groundwater condition data prior to the SGMA benchmark date of January 1, 2015 is included in the analysis. Please refer to Attachment D of this letter for best practices for using local groundwater data to verify whether polygons in the NC Dataset are supported by groundwater in an aquifer. If insufficient data are available to describe groundwater conditions within or near polygons from the NC dataset, include those polygons in the GSP until data gaps are reconciled in the monitoring network. • Please provide rationale for the 30-foot criteria cited in the text. The text states (p. 3-80): "Recognizing that much of the Kings Subbasin has a depth to groundwater greater than the deepest vegetative GDE rooting depth of thirty feet, many of the GDEs identified in the NC Dataset Viewer were mischaracterized." In TNC's GDE Guidance, the depth criteria of 30 feet is presented as a criterion for inclusion, not a standalone criterion for exclusion. In other words, if groundwater is within 30 feet of the ground surface, then a GDE can be identified. If it is not, then further analysis must be conducted (see Appendix III of the GDE Guidance). Please indicate what vegetation is present in all NC dataset polygons. The actual rooting depth of vegetation growing in the area should be considered, and this will vary by species dominance and habitats present. For example, some phreatophytes can root to 120-feet deep in more arid and drought stressed environments. Furthermore, rooting depths are likely to spatially vary based on the local hydrologic conditions available to the plant. Maximum rooting depths do not take capillary action into consideration, which will vary with soil type and is an important consideration since woody phreatophytes generally do not like to have their roots submerged in groundwater for extended periods of time, and hence can access groundwater at deeper depths. • The text states: "The Kings Subbasin also categorized GDEs within 100 feet of the Kings River and the San Joaquin River as "Possible GDEs." Please clarify how the 100-foot buffer was used to include or exclude GDEs in the NKGSA area, and how this is supported by groundwater level and plant physiological data. If there is a potential GDE near the river, we recommend that the entire GDE be included, rather than using an arbitrary 100-foot cutoff.	GSP will be changed to reference 100' buffer from (https://dot.ca.gov/programs/environmental-analysis/coastal-program/coastal-act-policy-resource-information/wetlands)
26	The Nature Conservancy	3.2.8	3-80	Please provide information on the historical or current groundwater conditions in the GDEs or the ecological conditions present. Refer to GDE Pulse (https://gde.codefornature.org; See Attachment E of this letter for more details) or any other locally available data (e.g., leaf area index, evapotranspiration or other data) to describe depth to groundwater trends in and around GDE areas, as well as trends in plant growth (e.g., NDVI) and plant moisture (e.g., NDMI). Below is a screenshot example of data available in GDE Pulse for NC dataset polygons found within the NKGSA area: • Please provide an ecological inventory (see Appendix III, Worksheet 2 of the GDE Guidance) for all potential GDEs that includes the vegetation types or habitat types and rank the GDEs as having a high, moderate or low value; and what characterizes the rank. • Please identify whether any endangered or threatened freshwater species of animals and plants, or areas with critical habitat were found or are expected to occur within any of the GDEs. The list of freshwater species located in the Kings Subbasin can be found in Attachment C of this letter. • For each identifiable GDE unit with supporting hydrological datasets please include the following: o Plot and provide hydrological datasets for each GDE. o Define the baseline period in the hydrologic data. o Classify GDE units as having high, moderate, or low susceptibility to changes in groundwater. o Explore cause-and-effect relationships between groundwater changes and GDEs. • For each identifiable GDE unit without supporting hydrological datasets please describe data gaps and / or insufficiencies. • Compile and synthesize biological data for each GDE unit by including: o Biological datasets for each GDE unit, and when possible provide baseline conditions for assessment of trends and variability. o Describe data gaps and insufficiencies. • Provide a description of the potential effects on GDEs, land uses, and property interests, including: o Cause-and-effect relationships between GDE and groundwater conditions. o Potential impacts to GDEs that are considered to be "significant and unreasonable". o Known hydrological thresholds or triggers (e.g., instream flow criteria, groundwater depths, water quality parameters, critical habitat constraints, etc.) for significant impacts to relevant species or ecological communities. o Land uses that and consider recreational uses (e.g., fishing/hunting, hiking, boating, etc.). o Property interests, such as privately and publicly protected conservation lands and opens spaces, wildlife refuges, parks, and natural preserves.	Thank you for your comments. All comments are given due consideration.

27	The Nature Conservancy	3.3.6	3-94	"Confined groundwater outflows were not calculated due to a lack of confined groundwater level information in NKGSA" (p. 3-98). This is a significant data gap. The confined outflow was estimated as 35,000 acre-feet per year (AF/year) based on data for other parts of the Kings Basin, compared to the total estimated outflow of 122,000 AF/year. Please expand on how this data gap will be filled in the proposed monitoring program described in Section 5.	The NKGSA has developed voluminous data and will continue to develop more data for evaluating and implementing the GSP.
28	The Nature Conservancy	3.3.8	3-100	Please clarify whether a term is included for native or riparian vegetation evapotranspiration and for wetlands in the North Kings historical, current, and future water budgets. The groundwater outflow to McMullin GSA was estimated by comparing the flow before development in the 1920's to the present. The induced outflow was estimated to be 43,000 AF from the North Kings GSA to McMullin GSA (p. 3-101). This amount is stated as included in the historical water budget but not in future water budgets, since McMullin is expected to mitigate this imbalance from 2020 to 2040. However, the historical, current, and 2040 (without projects) budgets had the same groundwater outflow of 122,000 AF/year. This seems inconsistent with the statement in the text. Please revise or clarify the text as necessary.	Thank you for your comments. All comments are given due consideration.
29	The Nature Conservancy	3.3.10	3-107	The Friant Water Authority estimated climate change impacts on the San Joaquin River using the Water Storage Investment Program (WSIP) data sets. "In general, the data showed a slight reduction in future supplies" (p. 3-110). Given the uncertainty associated with the Kings River supplies in the future, the assumption was made that the historical water delivery from the Kings River would be maintained. Please consider using the WSIP data to discuss potential impacts to groundwater conditions due to climate change on GDEs and aquatic ecosystems.	Thank you for your comments. All comments are given due consideration.
30	The Nature Conservancy	4.1	4-2	The Sustainability Goal does not consider GDEs or ISWs. Since GDEs are likely present in the NKGSA area (see comments under Checklist Items 16-20) they should be recognized as beneficial users of groundwater and should be included in the Sustainability Goal. In addition, a statement about any intention to address pre-SGMA impacts should be included. The Plan states that there are ISWs along the Kings River. In addition, there are multiple small creeks including Big Dry Creek, Pup Creek, Dog Creek, Redbank Creek, and Fancher Creek that may have ISWs. Further evidence that supports the presence of ISWs along these water courses include Figure 3-38 (p. 3-81) that identifies potential GDEs, and the depth to water measurements in wells for spring 1997 and 2012 presented in Appendix 3D (Technical Memorandum 4 Attachment 3). Please identify and describe all ISWs for these areas and include them in the GSP. GDEs are dependent, in part, on suitable water quality; however, the GSP only considers water quality for irrigation and domestic use. TNC recommends including ISWs and their potential GDEs in the sustainability goal and criteria. Since GDEs may be affected by water quality, they should be included in the Sustainability Goal.	Thank you for your comments. All comments are given due consideration.
31	The Nature Conservancy	4.2.3	4-12	This Measurable Objective does not consider GDEs. GDEs are often adjacent to streams or associated with riparian corridors where ISWs exist, even if only seasonally or discontinuously along a longitudinal or lateral profile. Please include GDEs (see comments under Checklist Items 8-10) in this section and whether the measurable objectives and interim milestones will help achieve the sustainability goal as it pertains to the environment.	Thank you for your comments. All comments are given due consideration.
32	The Nature Conservancy	4.4.3	4-31	This Measurable Objective does not consider water quality needs of GDEs. Please include a discussion about GDEs and water quality and whether the measurable objectives and interim milestones will help achieve the sustainability goal as it pertains to the environment.	Thank you for your comments. All comments are given due consideration.
33	The Nature Conservancy	4.6.3	4-63	This Measurable Objective does not consider ISWs. Please include ISWs (see comments under Checklist Items 16-20) in this section and whether the measurable objectives and interim milestones will help achieve the sustainability goal as it pertains to the environment.	Thank you for your comments. All comments are given due consideration.

34	The Nature Conservancy	4.2.2	4-7	This Minimum Threshold does not consider GDEs or ISWs. Please include GDEs and ISWs in this section and whether the measurable objectives and interim milestones will help achieve the sustainability goal as it pertains to the environment.	Thank you for your comments. All comments are given due consideration.
35	The Nature Conservancy	4.4.2	4-26	This Minimum Threshold does not consider water quality needs of GDEs. Please include a discussion about GDEs and water quality and whether the measurable objectives and interim milestones will help achieve the sustainability goal as it pertains to the environment.	Thank you for your comments. All comments are given due consideration.
36	The Nature Conservancy	4.6	4-48	This Minimum Threshold does not consider GDEs. GDEs are often adjacent to streams or associated with riparian corridors where ISWs exist, even if only seasonally or are discontinuous along a longitudinal profile. Please include GDEs in this section and whether the measurable objectives and interim milestones will help achieve the sustainability goal as it pertains to the environment. The Plan states that there are time periods of ISWs along the San Joaquin River; however, they are dismissed because they are not continuously connected. ISWs that are not continuously connected spatially and/or temporally are still ISWs and should not be excluded from this GSP. Even when ISWs are not continuously connected they should be included in the Minimum Thresholds. The analysis for potential depletion of ISWs in Section 4.7 should include all beneficial uses and users of surface water that could be affected by groundwater withdrawals, including environmental users. The SJRRP identifies instream flow requirements for salmon in Reach 1a and potentially 2a which forms the northern border in the Plan area (http://www.restoresjr.net/about/overview-map/). Please include instream flow requirements and critical habitat designations in this section and whether the measurable objectives and interim milestones will help achieve the sustainability goal as it pertains to the environment.	Thank you for your comments. All comments are given due consideration.
37	The Nature Conservancy	4.2.1	4-3	This section only describes undesirable results relating to human beneficial uses of groundwater and neglects environmental beneficial uses and users that could be adversely affected by chronic groundwater level decline. Please add “potential adverse impacts to GDEs and native freshwater species” to the list of potential undesirable results presented in Section 4.2. The GDE Pulse web application developed by TNC provides easy access to 35 years of remote sensing data to view trends of vegetation metrics, groundwater depth (where available), and precipitation data. This satellite imagery can be used to observe trends for NC dataset polygons within and near the GSA. Over the past 10 years (2009-2018), some NC dataset vegetation polygons have experienced adverse impacts to vegetation growth and moisture along the San Joaquin River and Kings River. An example screen shot from the GDE Pulse tool is presented under Checklist Items 11-15 above.	Thank you for your comments. All comments are given due consideration.
39	The Nature Conservancy	4.4	4-22	This section only describes undesirable results in terms of meeting drinking water standards. The following is a link to a paper by Smith, Knight and Fendorf (2018) titled “Overpumping leads to California groundwater arsenic threat”: (https://www.nature.com/articles/s41467-018-04475-3). The section should be modified to state that overpumping and dewatering of aquitards has been identified as a potential source of elevated arsenic concentrations above drinking water standards in San Joaquin Valley aquifers. In addition, any potential undesirable results from degradation of water quality that may impact GDEs and freshwater species in the area should be discussed in this section.	Thank you for your comments. All comments are given due consideration.
40	The Nature Conservancy	4.6	4-48	This section does not consider Undesirable Results for ISWs. The Plan states that there are time periods of ISWs along the San Joaquin River; however, they are dismissed because they are not continuously connected. Even though the ISWs are not continuously connected they should be included in the Undesirable Results. The analysis for potential depletion of ISWs in Section 4.7 should include all beneficial users of surface water that could be affected by groundwater withdrawals, including environmental. The SJRRP identifies instream flow needs for salmon in Reach 1a and potentially 2a which forms the northern border in the Plan area (http://www.restoresjr.net/about/overview-map/). Please include instream flow requirements and critical habitat designations in this section and whether the measurable objectives and interim milestones will help achieve the sustainability goal as it pertains to the environment.	Thank you for your comments. All comments are given due consideration.

41	The Nature Conservancy	5.2	5-3 to 5-12	Please address how the requirement to link and correlate groundwater level declines to biological responses, and significant and adverse impacts to GDEs and ISWs will be addressed by the monitoring network. The proposed wells to be used for monitoring groundwater levels in the unconfined aquifer are shown in Figure 5-2 (p. 5-4). Many of the monitoring wells are missing well construction information. The missing well information is a known data gap and was acknowledged on p. 5-10. To accurately characterize GDEs, please clarify how the unconfined aquifer will be monitored and how many wells will be used. The text states that the intent is to monitor the unconfined aquifer at present. “Groundwater level data from wells in the NKGSA will continue to be collected and evaluated to gain a better understanding of whether the confined groundwater conditions east of the Corcoran Clay are present” (p. 5-5). Wells that monitor the deeper confined or semi-confined aquifer will be added in the future. Monitoring of the confined aquifer may become a separate program in future years. Please clarify how many of the wells on Figure 5-2 represent the unconfined aquifer.	GSP will be changed to clarify GSA’s plan to collect missing well construction information.
42	The Nature Conservancy	5.7	5-32 to 5-39	The NKGSA intends to use data from wells near the San Joaquin and Kings Rivers in the current monitoring network for depletion of ISWs monitoring. The data obtained by the SJRRP will be reviewed as it becomes available to supplement that well information. The long-term monitoring network shown on Figure 5-2 shows only a few wells that are near rivers and the well depths and screened intervals are not provided. Please reconcile data gaps in monitoring for ISWs with specific recommendations (shallow monitoring wells, stream gauges, and nested/clustered wells) along surface water features to improve ISW mapping and inform an adequate analysis.	Thank you for your comments. All comments are given due consideration.
43	The Nature Conservancy	6.1	6-4 to 6-11	The NKGSA area includes many GDEs and ISWs (see our comments under checklist items 8-10 and 16-20 above) that are beneficial uses and users of groundwater, and may include potentially sensitive resources and protected lands. Environmental resource protection needs should be considered in establishing project priorities. In addition, and consistent with existing grant and funding guidelines for SGMA-related work, priority should be given to multi-benefit projects that can address water quantity as well as providing environmental benefits or benefits to disadvantaged communities. Please include environmental benefits and multiple benefits as criteria for assessing project priorities.	Thank you for your comments. All comments are given due consideration.
44	The Nature Conservancy	6.2	6-4 to 6-11	This Section identifies many important projects; however, the descriptions for these projects only identify benefits to groundwater level and supply. Since maintenance or recovery of groundwater levels, or construction of recharge facilities, may have potential environmental benefits in many cases it would be advantageous to demonstrate multiple benefits from a funding and prioritization perspective. • For the projects already identified, please consider stating how ISWs and GDEs will benefit or be protected, or what other environmental benefits will accrue. • If ISWs will not be adequately protected by those listed, please include and describe additional management actions and projects targeted for protecting ISWs. • Recharge ponds, reservoirs and facilities for managed stormwater recharge can be designed as multiple-benefit projects to include elements that act functionally as wetlands and provide a benefit for wildlife and aquatic species. In some cases, such multiple-benefit projects and facilities have been incorporated into local HCPs and NCCPs, more fully recognizing the value of the habitat that they provide and the species they support. For projects that construct recharge ponds, please consider identifying if there is habitat value incorporated into the design and how the recharge ponds will be managed to benefit environmental users. • There are wetlands shown on Figure 3-19 (p. 3-37), which include recharge basins of the cities, irrigation districts, wastewater treatment facilities, and flood control district. Please indicate whether the existing recharge basins are operated (or could be operated) as habitat suitable for migrating birds or other species and could be included in an HCP or NCCP. • For examples of case studies on how to incorporate environmental benefits into groundwater projects, please visit our website: https://groundwaterresourcehub.org/case-studies/recharge-case-studies/	Thank you for your comments. All comments are given due consideration.
45	The Nature Conservancy	6.3	6-12	This section discusses the Management Actions for GSP implementation and SGMA compliance; however, these actions are focused on meeting groundwater level and supply measures and do not include support for GDEs or ISWs. Please consider modifying the Management Actions to include education and outreach for protection of GDEs and ISWs, as well as specific management of these ecosystems and the species they provide for.	Thank you for your comments. All comments are given due consideration.

46	Malaga County Water District	2	2-13	Describes ponds at Malaga's wastewater treatment facility as being used to "percolate a portion" of treated effluent from the WWTF. All of the treated effluent from the Districts WWTF is discharged into percolation ponds for recharge. Describes Malaga's groundwater as being delivered from its 900-foot-deep wells. The reason the District utilizes 900-foot-deep wells is due to the presence of DBCP which requires the District to have wells of this depth. The necessity of the well depth due to DBCP contamination should be added to this description. Further discussion of DBCP contamination of the groundwater in the Malaga area is discussed below.	GSP will be changed. Thank you for your comments. All comments are given due consideration.
47	Malaga County Water District	2.3.4	2-27	Section 2.3.4 related to Permitting New or Replacement Wells, contains a discussion of Fresno County's permitting process including Policy PF-C.20 which states that the County shall not permit new private water wells within areas served by a public water system. The District agrees with this policy and encourages the County and the North Kings GSA to develop policies that will also require the all review of all permit applications within the sphere of influence of an agency that operates a public water system by the agency both to monitor the groundwater quantity and the quality of the groundwater supply (see discussion of DBCP plume contamination in the Malaga area below). Additionally, there is a discussion in this section of Malaga's special legislation, (Water Code Section 31144.7 et. seq.) as the Districts authority to require the County to route all applications for new water wells within Malaga's boundaries to Malaga for review. That legislation also gives Malaga the authority to manage groundwater supplies within its jurisdiction which read together with Water Code section 10750.6 means that Malaga has the authority to manage the ground water supply within its boundaries and that authority is not affected by the Groundwater Management Act. The GSP should include a discussion of Malaga's special legislation as it relates to the Groundwater Management Act and Malaga's authority to manage groundwater within its jurisdiction.	Thank you for your comments. All comments are given due consideration.
48	Malaga County Water District	2	2-36	States that "[w]hile Malaga and Pinedale CWD's meet SGMA eligibility criteria as a GSA, the governing bodies for these local agencies elected to be represented in the North Kings GSA by the Fresno Irrigation District and the City of Fresno, respectively." This statement as it relates to the Malaga County Water District is completely false and not supported by the record. First, while it is true that Malaga meets the criteria to be a GSA, Malaga did not elect to become a GSA in part because of the Districts authority to manage groundwater as described above. At no time did the Board of Director of the Malaga County Water District elect to be represented by the Fresno Irrigation District nor does the Fresno Irrigation District have any authority to represent the Malaga County Water District or its interests on the North Kings GSA board. However, since the District has the authority to manage groundwater within its boundaries, the District is not under the jurisdiction of the North Kings GSA however, the District will co-ordinate and cooperate with the NKGSA and all of the GSA's within the Kings Basin to achieve groundwater sustainability.	GSP will be changed to clarify that Malaga elected to not be on the NKGSA board.
49	Malaga County Water District	3.2.5 & 4.4	3-58 & 4-21	There is a description of Dibromo-Chloropropane (DBCP) in the groundwater quality issues section of the GPS (Sections 3.2.5 and 4.4) fails to identify that the Malaga County Water District has had to shut several of its public water system wells due to DBCP contamination. Further, due to the contamination Malaga's current wells have been required to be constructed to a depth of 900 feet and have required significant study and mitigation measures to prevent contamination of the public water supply resulting in significant increase in the costs of delivering potable water. The GSP should reflect that the depth of Malaga's wells are the result of DBCP contamination rather than any lowering of the water table in the Malaga area here an on pages 2-13.	Thank you for your comments. All comments are given due consideration.
50	Malaga County Water District	3	3-112	Future water assumptions. This section states that Malaga's water demand is assumed to increase from 1600 AF/year (2016/2017) to 1900 AF/year (2040). Malaga anticipates that is consumption will decrease from 1600 AF/year (2016/2017) to 1000 AF/year (2040) due to a combination of changes of use (industrial to commercial) or use of recycled water for industrial use).	Comment does not match data provided during GSP development. P&P to follow up with Malaga
51	Malaga County Water District	6	6-2	The District looks forward to working with and cooperating with the NKGSA in projects within its boundaries, such as the Basin CF project and other projects as they are identified.	Thank you for your comments. All comments are given due consideration.
52	California Poultry Federation (Bill Mattos)			The California Poultry Federation ("CPF" appreciates this opportunity to comment on the draft North Kings Groundwater Sustainability Plan (the "Draft GSP"). CPF is the trade association for California's diverse and dynamic poultry industry. Our members include growers, hatchers, breeders, and processors from across the industry that work with chickens, turkeys, ducks, game birds, and squab. Water is essential for all of them—both for nutrition and for maintaining sanitary conditions. CPF therefore supports effective measures to assure reliable water supplies. In this regard, CPF commends that Draft GSP for making its first priority the development of projects that augment available water supplies. We encourage the North Kings GSA to continue identifying and implementing measures to increase groundwater recharge and obtain additional surface water. We further recommend adopting sufficient incentives—such as additional extraction rights—for landowners to propose and support private participation in initiatives to enhance supplies.	Thank you for your comments. All comments are given due consideration.

				To the extent demand reductions may be necessary, CPF trusts the public will have a meaningful opportunity to participate fully in their development, including by submitting written comments on the proposals and supporting data. It will be particularly important to consider the associated costs, which, as the Draft GSP recognizes at (6-23), require further evaluation. CPF appreciates your consideration of these comments. Please let me know if you need any further information.	
53	Asian Business Institute & Resource Center Southeast Asian (SEA)			***Background*** Due to language barriers and the mere fact that we have no equivalent words in translation, the Southeast Asian (SEA) population that the Asian Business and Resource Center (ABIRC) serves barely understands the SGMA enough to provide fruitful comments and they are deeply concerned about the potential impact of the recommended policy. In fact, after speaking with non-SEA, English speaking farmers across many GSAs, they too agree that the language is complex and not easily understandable in terms of day-to-day impact. Many of the SEA farmers clearly do not have the same access and resources as the big farmers. A small SEA farmer is also a small business. They are the CEO, Accountant, Planter, Harvester, Pest Control, and Janitor. Technically, they operate on their farm from sunrise to sunset. Even if they were to attend the local Groundwater Sustainable Agency meetings, there are also language barriers, cultural barriers, and systematic barriers. Even the average English-speaking native may have difficulty understanding the GSP for themselves; the challenge will be at multi-fold the amount for a non-English speaking individual. According to the University of California Cooperative Extension Fresno County, there are about 2,000 SEA farmers/growers, many of whom operate on leased property, working on small (5 to 10) acres. Unlike the big farmers, a typical SEA farm operates in a distinct community-specific pattern. In a one parcel plot of land, there will be one primary lessee who will then have multiple sub-lessees. The owners of the farm may not communicate SGMA information to the primary lessee, thereby impacting many farmers on one plot of land. Adding to the complexity of the issue, the majority of SEA farmers are older, do not read English, do not use social media and are not internet savvy. Keeping with tradition, information is passed on one-by-one or in a community forum in SEA languages. Mainstream outreach methods such as mailing post-cards and posts via social media are highly ineffective for our constituents. We believe that when push comes to shove and wells become strictly monitored, it will be the small SEA farmers who will be impacted the hardest. They will lack representation, resources, and dollars. ***Collaborative work*** Throughout the one-year period that ABIRC staff have been educating the SEA community about the Sustainable Groundwater Management Act (SGMA), we can conclude that 99.9% of the SEA community did not know about the SGMA and how the upcoming policy will affect the SEA farmer. During this year of engagement with the SEA community we have been welcomed by the North Kings GSA to represent the community we served. Some of the intentionality of collaboration was due to the lack of SEA staff at the North Kings GSA. As representatives of the SEA community, we submit recommendations about SGMA on their behalf. *Stakeholder inclusion* The Stakeholder Inclusion[1] premises that have not been held up during the planning period need to be promoted during SGMA implementation: • SGMA requires consideration of the interests of diverse, social, cultural, and economic elements of the populations within the basin during implementation. • GSAs are encouraged to send *appropriate* notices. Postcards and emails are not the appropriate way to engage older SEA farmers who may be monolingual. • Describe GSA outreach efforts to disseminate changes and updates once the law is to disadvantaged communities per California Code of Regulations, § 354.10(d)(3)). • The Dymally-Alatorre Bilingual Service Act (Gov. Code, § 7290 et seq.) applies to all local agencies that serve a substantial number of non-English speaking people. The goal of this act is to ensure that information and services are provided in the language of non-English speakers. We encourage the North Kings GSA to determine the languages spoken by the substantial number of non-English speakers in the area of the basin plan and send notices in those languages. Note that diesemination of information via email may still not reach the majority of the SEA farmers because they do not have internet access and the last thing that they want to do at the end of a 14-hour day is to goto a tea/coffee shop to access the internet. • While local agencies have discretion in determining what constitutes a substantial number of non-English speaking people and a sufficient number of qualified bilingual staff persons (Gov. Code, § 7293.), GSAs should work with community organizations to assist them to fulfill the language needs.	Thank you for your comments. All comments are given due consideration. Thank you for your comments. All comments are given due consideration. GSP Section 2.5.5 changed to include…The GSA will continue to pursue effective methods of communication with stakeholders, including rural domestic pumpers and small farmers, to provide local seasonal and annual groundwater conditions and basic groundwater and well information.

[1] https://www.waterboards.ca.gov/water_issues/programs/gmp/docs/sgma/sgma_stakeholder_inclusion.pdf

				Policy Recommendations 1) Commitment to follow GSA regulations identified above with regard to community outreach and engagement 2) Commitment to support community outreach dollars for the SEA small farming community 3) Commitment to continue to work with non-profit and community organizations that serve the SEA small farming community 4) Proactively look for mitigation dollars or activities that will support sustainability and growth of the SEA small farmers within the GSA basin 5) Commitment to utilize ethnic media tools for outreach and education 6) Commitment to hire a SEA staff member who can assist nonprofits and community organizations to better outreach to the SEA small farming community 7) Work with nonprofit and community organizations to come up with a plan/strategy to provide sustainable outreach 8) Commitment to include SEA small farming issues when discussing GSA policy issues Commitment to bring in additional SEA small farmers, community partners, and individuals to join and participate in committees	
54	Sue Ruiz	2	2-6 & 2-7	**Determining the number of domestic wells and defining well communities (found mostly in Ch 2 Plan Area, I believe)** • Page 2-6 and 7 describe how the number of active wells was determined with best available data. However, this data is most likely inaccurate since many domestic wells were constructed prior to 1975 in addition to the likelihood that County records are not accurate as described in the Plan. The GSA can't know the number of vulnerable wells that will go dry or have drinking water quality impacted by decreasing GW levels without a better understanding of how many wells there really are and where they are located. • Communities of domestic wells- There are three large ones I'm aware of (Easton, Centerville, and I believe Rolinda) as well as several "neighborhoods" such as those near CSA 39 A&B (West Park), south of Fresno near Central and Cherry Avenue and Orange Avenue, NE of Clovis, and perhaps others not known. I don't feel there has been enough effort to identify and map all of those communities. Nor do I feel the "community profile" of these domestic well communities is sufficient. The number of wells in each is not listed, the approximate depth of most wells is not identified, the level or type of contamination is not described, the economic and cultural profile of each community is lacking. An accurate "profile" of each community's number of wells, existing water contamination status, well depths, and economic level is foundational to the GSA's ability to monitor, prevent and mitigate undesirable results. I believe a "profile" is required to be part of the GSP. I recommend the GSA continue to work with the County, non-profits, TA providers, and the communities themselves to gather more data.	The NKGSA has developed voluminous data and will continue to develop more data for evaluating and implementing the GSP.
55	Sue Ruiz			**Identification and monitoring of GW contamination and plumes** I am aware of the following: • The NK GSA recognizes the amount of data regarding domestic well contamination is lacking, thus the GSP in its released version (8-15-2019) also lacks significant data. • NKGSA desires to gather more data. • Gathering such data is challenging due to the following: o Lack of available information directly from private well owners o Lack of County records for contaminants other than those identified at the owner's request when a new well is constructed. Contaminants typically tested at this time are usually nitrate and bacteria. Most owners don't know what to test for and/or County does not fund tests for other contaminants (DBCP, 123 TCP, uranium, arsenic, others). o It is my understanding confidentiality of individual well water quality is protected from public release. Therefore, tests conducted by community groups and TA providers should not be released per specific address unless written permission has been obtained from the well owner. o County well log records, DWR well logs, GAMA and other state monitoring programs provide limited information due to minimal contaminants tested and/or lack of records pre 1970's. • The GSA intends to rely on CVSalts, ILRP, and other State contaminant monitoring programs to provide data. • "On farm recharge" and ponding basins are critical to sustainable GW levels. However, I offer the following recommendations and requests, some of which may already being done:	Thank you for your comments. All comments are given due consideration.

				• It was recommended that public water systems located within domestic well communities be used to establish a very basic contaminant profile for the community. These wells will help identify existing contaminants and can also become monitoring wells for contaminant flows and behaviors. I believe the GSA did, or started to, gather this information from the SWRCB DDW public records. This effort would, at the very least, be a start. • Nonprofits and TA providers that have conducted community well samplings could probably provide that information in a manner that does not break confidentiality, but still provide a community profile of existing contaminants. • If data has not yet been gathered, results from tests conducted by the County will help identify data points of contaminants in either domestic well communities or individual wells throughout the GSA. • The GSA should provide, seek funds for, and/or work with the County to educate well users about local contaminants, assist with the funding of well sampling (in a manner to be determined), and collect this data in order to better identify and monitor plumes of contamination. • The GSA should overlay a map of GSA monitoring wells with communities/neighborhoods of domestic wells. The GSA should work with the County, DDW and the State programs (ILRP and CV Salts) to monitor all contaminants, not just nitrate, in the GSA monitoring wells and public water systems within the area of domestic well communities/neighborhoods. • Because many contaminants (such as nitrate) are present in shallower aquifers, the GSA needs to acknowledge and respond to the fact that using the deeper monitoring wells spread throughout the GSA will not provide contamination data that accurately monitors contamination plumes in shallower domestic wells. • While ponding basins have been shown to decrease nitrate levels near them, and while “on farm” recharge is critical to sustaining GW levels, the Plan doesn’t provide evidence that the GSA has considered or intends to monitor plumes where these recharge activities will take place. Again, without knowing existing contamination levels and without designated monitoring wells drawing from the aquifers used by most domestic wells, how will this monitoring be provided? • CRLA’s comments in Section b on pages 3- 4 of their public comment document dated October 16, 2019 describes very well my personal feelings about the need to increase and improve plume monitoring. Therefore, I concur with their comments on this matter. Real case scenario to consider: Several acres of a crop were planted during the year 2018 in the center of Easton. What monitoring well will determine the existing level of contaminants near those crops and continue to monitor those contaminants? What monitoring well will track how plumes are impacted by declining GW levels in this community, levels that may decline more rapidly now that this crop is located directly in the center of the community? Or is that not the responsibility of the GSA? Is that farmer going to be held responsible for creating “undesirable results” that didn’t exist prior to the implementation of SGMA? Or is there no responsibility until after 2040? These are questions that need to be considered within the GSP.	
56	Sue Ruiz	4	4-3	**Identifying and monitoring domestic wells going dry** In my view, the GSA has set the “minimum threshold” and “undesirable result” in regard to domestic wells going dry at a dangerous level. “Significant and unreasonable” are, as stated, described by the GSA, beneficial users, etc. (p 4-3). How will “significant” and “unreasonable” be determined when a base line has not been established? How many wells are there? How many are at risk of going dry before 2040? Nobody knows. The GSA should know. Example: I live in Easton, a community of approximately 400 or more wells. The water level has declined an average of approximately 2 feet per year since the 1960’s, based on FID monitoring wells in the region. The current GW level is approximately 97 feet below ground level. My well is approximately 150 feet deep. At the historic rate of decline, my well will be nearly dry by 2040. At that point my husband and I will be in our mid-80’s. We won’t be able to afford a new well. To me, a beneficial user, this is highly significant and undesirable. The way I understand SGMA, the GSA isn’t held responsible to ensure no significant, unreasonable or undesirable results until 2040. I also recognize that “without SGMA lots of wells will go dry, with SGMA less wells will go dry.” But without sufficient base knowledge of how many wells will be impacted during the 20-year period prior to reaching sustainability, how does the GSA truly determine “undesirable”, “unreasonable” or “significant” impacts? The GSA needs to work further with the County, the State, local non-profits, TA providers, and the well owners directly to help develop a base-line so everybody, (GSA included) can monitor, prevent as much as possible, and prepare for declining GW levels until the 2040 target sustainable target date.	GSP changed in 4.2.2.3 to discuss analysis of the impacts of the water level measurable objectives and minimum thresholds on domestic wells.

57	Sue Ruiz			**Educating and informing domestic well owners and users** I honestly don't know if the GSAs will be held responsible for undesirable results prior to 2040. I'll leave that argument to the lawyers. However, at the VERY least the NK GSA needs to develop a strong, solid, consistent mechanism to inform all domestic well users about GW levels and water quality. • Ground water levels: Many/most well owners don't know the depth of their wells. Nearly all don't have a clue what the GW level is, how to find out, or what it's doing over time. How can they prepare for a well going dry without this information? • Water quality: Many/most well users don't know what contaminants are present in their region, how to test for them, or how to ensure they have safe drinking water. And they certainly don't have any way of knowing how the contaminants are behaving- moving, declining, staying stagnant, or increasing. • What to do: The NK GSA, via FID and the County in the non-FID area need to develop and utilize a consistent education mechanism that informs domestic well users of these issues, how to monitor for themselves, how to mitigate contamination, and to prepare for drilling a new well if that looks imminent prior to 2040. Once a year "SGMA reports" will not work. Domestic well users need information that is relevant to their understanding of groundwater and needs. A quarterly, or at least semi-annually, newsletter geared directly for domestic well users would help well users become informed and prepare for contamination and dry well conditions. The GSA should budget for this education providing the information directly or by contracting with a non-profit, TA provider, and/or consultant who best knows how to communicate with rural communities and well users.	GSP Section 2.5.5 changed to include…The GSA will continue to pursue effective methods of communication with stakeholders, including rural domestic pumpers and small farmers, to provide local seasonal and annual groundwater conditions and basic groundwater and well information.
58	Sue Ruiz			**Small Farmers** In my work with the NK GSA I have been privileged to learn about the small farmers, particularly the Hmong farmers, in the area. I want to comment on how critical all of the above statements are to them as well. Without the shallower domestic wells to irrigate their small farms, their livelihood will become non-existent. Without skills to support their families in other ways, they will be forced to used welfare programs, a situation that isn't beneficial to anybody. In addition to supporting their families, I have recently read of how the crops most Asian and small farmers grow is showing to be beneficial to soil health and attracts natural pollinators more abundantly that traditional annual or permanent crops large farms grow. Plus, we all love and benefit from the diversity of the "leafy greens" and flavorful dishes from the smaller farms. I'd like to encourage the NK GSA to strongly support and pay attention to how all policies and decisions will impact these beneficial water users as well.	Thank you for your comments. All comments are given due consideration.
59	League of Women Voters of Fresno	ES		**Executive Summary** The section of the GSP that members of the public are most likely to read is the Executive Summary. The public should be made aware of the role of water conservation in achieving sustainability, as this management action will involve the general public. Plan Area Section 2.4.8 - Efficient Water Management Practices – provides an excellent and concise explanation of the importance of water conservation to achieving sustainability. "Water conservation has been and will continue to be an important tool in local water management, as well as a key strategy in achieving sustainable groundwater management. All of the member agencies engage in some form of water conservation including water use restrictions, water metering, education, tiered rates, etc. These water conservation programs were tested during the 2014-2015 drought, which included State-mandated urban water restrictions for the first time. Details of water conservation programs can be found in various documents, including Urban Water Management Plans and USBR (United States Bureau of Reclamation) Water Management Plans. Many agencies also have multi-stage water shortage contingency plans to help conserve water in droughts. Efficient water management practices will include maximizing the beneficial uses of water along with recycled water use as it can replace potable water use in some instances. Future efforts will include an increased focus on elevating awareness on groundwater overdraft and land subsidence and explaining the requirements of SGMA. Some or all of these conservation efforts will be necessary to achieve groundwater sustainability." Recommendation: Incorporate the information in Plan Area Section 2.4.8 - Efficient Water Management Practices - into the Projects and Management Actions Section of the Executive Summary	GSP will be changed on page ES-16 to include Plan Area Section 2.4.8 paragraph.

60	League of Women Voters of Fresno	6		**Projects and Management Actions-Chapter 6** California's Human Right Water Act recognizes that "every human being has the right to safe, clean, affordable, and accessible water adequate for human consumption, cooking, and sanitary purposes." The human right to water extends to all Californians, including disadvantaged individuals and groups and communities in rural and urban areas. The League of Women Voters of California supported this legislation, and also the implementation of projects and water management practices to make the human right to water a reality in communities that lack this basic necessity of life. Disadvantaged Communities in the NKGSA are identified on Page 2-37 of the Plan Area section of the Draft GSP. "As shown in Figure 2-8 Disadvantaged and Severely Disadvantaged and Severely Disadvantaged Communities in the North Kings GSA, much of the urban areas within North Kings GSA boundaries is designated as a disadvantaged community (DAC) based on American Community Survey Median Household Income data. These areas include the City of Kerman, City of Fresno, and the unincorporated communities of Biola, West Park, Calwa, Easton, Malaga, Pinedale, and Friant. Additionally, Bakman Water Company services an area defined as a Disadvantaged Community." Since the time that NKGSA's Draft GSP was released for public review and comment, legislation was passed and signed by Governor Newsom to establish a Safe and Affordable Drinking Water Fund. It will provide $130 million in funding over 10 years for projects to address drinking water issues in disadvantaged communities. We hope that member organizations in the NKGSA will take the initiative to identify projects and apply for funding during this 10 year period to address drinking water quality and quantity issues in disadvantaged communities in the NKGSA. Obtaining grant funding is essential for small disadvantaged communities with water quality and/or water quantity problems. This includes small community water systems and rural residential communities with individual household wells. These communities can have difficulty funding water system improvements and on-going operations and maintenance. Consolidation is the preferred option if a community is located near a larger community with better water quality and quantity. In projects involving consolidation grant funding is important to avoid rate impacts and potential capacity constraints to the larger community. In the NKGSA, it is likely that the larger community will also be a disadvantaged community. In reviewing the Chapter 6 Project and Management Actions section of the Draft GSP, we are pleased that the list of planned groundwater recharge projects include the small disadvantaged communities of Biola and Malaga. • Recommendation: LWVF encourages the NKGSA member organizations to identify and apply for funding, especially grant funding such as the Safe and Affordable Drinking Water Fund, for projects to address water quality and quantity issues in disadvantaged communities, including those in rural residential areas, and to do so early in the 2020 to 2040 SGMA implementation period. The California Water Boards recently released a "Sustainable Groundwater Management Act: Water Quality Frequently Asked Questions" guidance document to provide clarity and assistance to GSAs as they prepare their GSPs. https://www.waterboards.ca.gov/water_issues/programs/gmp/docs/sgma/sgma_water_quality_faq.pd The FAQ document states that "A GSA must consider potential impacts to water quality when planning groundwater recharge projects. Recharge methods vary from surface infiltration (e.g., using recharge ponds or flooding agricultural lands) to groundwater well injection. Sources of water for recharge may include treated wastewater, stormwater, irrigation return flow, purchased water, or streamflow diverted under a permit or other basis of right. Depending on the source, the project may require a permit from the Regional Water Quality Control Board and may need to comply with waste discharge requirements, which include extensive water levels and quality monitoring around the recharge site. Even relatively unpolluted water used for recharge, such as most purchased water or streamflow, may contain constituents of concern. For treated wastewater, stormwater, or irrigation return flows, contaminants such as pesticides, sediments, nutrients, salt, pathogens, and heavy metals should be considered. Potential changes in the receiving groundwater due to geochemical reactions with the recharge water or causing the mobilization of existing constituents of concern may also be a factor. A GSA can find out more information about water quality concerns associated with recharge projects by contacting its respective Regional Water Board." 9) Recommendation: When identifying and planning groundwater recharge projects, consult with the Central Valley Regional Water Quality Control Board regarding potential water quality concerns in the area in and around the proposed project.	Thank you for your comments. All comments are given due consideration.

61	League of Women Voters of Fresno	2.3		Fresno County overlies all, or part, of four groundwater subbasins that are subject to SGMA. The Kings, Westside and Delta-Mendota subbasins are critically overdrafted, and GSPs must be submitted to the State by January 31, 2020. A GSP for the Pleasant Valley Subbasin is due to the State by January 31, 2024. In the Kings Subbasin alone, six of the seven GSAs contain unincorporated areas that fall under the County's land use planning jurisdiction. Portions of the Kings, Westside, and Delta-Mendota subbasins are in other counties. The County of Fresno is a member organization of the NKGSA and nearly all other GSAs in Fresno County. At the same time that GSPs are being drafted and finalized for submission to the State, Fresno County is in the process of updating its General Plan. The last General Plan update was in 2000. In the age of SGMA, this general plan update will be a complex and challenging task for the County, as land use characteristics and water conditions vary greatly between the groundwater subbasins. For example, according to population figures on Plan Area page 2-11, over 60 percent of Fresno County's total population resides in the Fresno and Clovis Metropolitan area. In contrast, some valley areas of the County are sparsely populated. It is our understanding that the County plans to review and incorporate information from the GSPs submitted to the State in January 2020 into the process of updating the General Plan. At a SGMA presentation to the Fresno County Board of Supervisors on May 14, 2019, Fresno County Water and Natural Resources Division Manager Glenn Allen explained to the Board the arduous task of implementing the GSPs after they are submitted to the State. "We'll continue to partner with local agencies [after January 31, 2020] to assist in GSP implementation. That's going to be a heavy lift for us because there's going to be a lot of evaluation and potential revisions to our County General Plan that we will be bringing back to you [Board of Supervisors]." Of concern are any remaining Fresno County General Plan policies and programs from 2000, and related ordinances, which would allow groundwater, and/or surface water to be transferred out of the critically overdrafted groundwater subbasins in the County. Policy PF-C., adopted in 2000, is listed as a relevant land use policy in NKGSP Plan Area Section 2.3.3. Its related Program is PF-C.F, and its related ordinance is Chapter 3 of Title 14 of the Ordinance Code. • Recommendation: Following submission of the NKGSA GSP to the State, we encourage the County of Fresno and other member organizations in the NKGSA to review and consult on any pertinent updates to the Fresno County General Plan and the general plans of the cities of Fresno, Clovis, and Kerman. • Recommendation: Remove Fresno County General Plan Policy PF-C., Program PF-C.F, and Chapter 3 of Title 14 of the Ordinance Code and replace them with General Plan water policies and programs, and ordinances that are more appropriate for the critically overdrafted groundwater subbasins in Fresno County, including the North Kings.	Thank you for your comments. All comments are given due consideration.
62	California Department of Fish and Wildlife	3.2.7.1	3-75 to 3.79	Interconnected Surface Water Systems (pages 3-75 to 3-79). Analysis of interconnected surface waters appears to characterize all 'losing' streams as disconnected without providing evidence of no hydraulic connectivity between a stream and an underlying aquifer. a. Issue: Multiple times the GSP identifies stream reaches where groundwater elevations are lower than streambed elevations and subsequently characterizes these reaches as disconnected. Examples include: i. "When the river is flowing at low flow or base flow, the groundwater elevation is below estimated channel elevation, indicating a lack of interconnection " (page 3-78). ii. "…the two closest wells in this location north of the river, are below the estimated channel bed elevation except during periods of high flow which indicates that the river is connected to the north only during periods of high flows" (page 3-78). iii. "At times when the river is flowing at low flow or base flow, the groundwater elevation in the wells is near the estimated channel elevation potentially indicating a lack of interconnection" (page 3-78). According to SGMA regulations, "'Interconnected surface water' refers to surface water that is hydraulically connected at any point by a continuous saturated zone to the underlying aquifer and the overlying surface water is not completely depleted" [23 CCR S 351 (o)]. This means that even if groundwater elevation is lower than streambed elevation, there may still be hydraulic communication between the aquifer and streamflow if there is a saturated layer connecting the two and pumping from the aquifer may yet cause streamflow depletion (Barlow and Leake, 2012). This saturated zone may not be captured in data from proximate monitoring wells. It is therefore unclear in the GSP analysis if 'losing' . streams were thoroughly evaluated for hydraulic connectivity. The interconnected surface water narrative also lacks specific estimations of the quantity and timing of streamflow depletions as specified in 23 CCR S 354.16(f).	GSP changed to state that because data does not show evidence of interconnection, an estimate of the quantity and timing of depletions is not included.

				b. Recommendation: The Department recommends the careful review of existing information on surface water-groundwater interconnectivity and recommends the GSA: i. Clarify methods used to categorize 'losing' streams as disconnected. ii. Identify the estimated quantity and timing of streamflow depletions in the Subbasin. If this information is not available, identify an expeditious and specific path to estimating these values.	
63	California Department of Fish and Wildlife	3.2.8	3-80 to 3-81	The GDE identification section, pursuant to 23 CCR S 354.16 (g), is based on very limited information to demonstrate exclusion of ecosystems that may depend on groundwater. a. Issue: Methods applied to the Natural Communities Commonly Associated with Groundwater (NCCAG) dataset to eliminate potential GDE's are not robust. b. Depth to Groundwater: The removal of areas with a depth to groundwater greater than 30 feet in Spring 2017 relies on a single-point-in-time baseline 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 this singular groundwater elevation measurement is questionable 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), but that rely on groundwater table recovery periods for long term survival. c. Adjacent to Surface Water: The GSP did not fully evaluate potential GDEs that depend on adjacent losing surface water bodies and a GDE's adaptability and opportunistic nature in accessing water supply. The GSP assumption that these potential GDE's are accessing and primarily dependent on surface water is based on proximity to a surface water source, but this assumption is poorly justified and there is no acknowledgement of the potential for shifting reliance between surface and ground water. Additionally, GDEs that are near interconnected surface water bodies may depend on sustained groundwater elevations that stabilize the gradient or rate of loss of surface water, meaning that ecosystems near interconnected surface waters may depend on sustainable groundwater elevations. Therefore, it is possible that any of these potential GDEs rely on groundwater during specific seasons or water year types. d. Recommendations: The Department recommends the NKGSA consider the following for information gathering related to GDE's: i. Depth to Groundwater: Develop a hydrologically robust baseline which includes areas with a depth to groundwater greater than 30 feet that relies on multiple, climatically representative years of groundwater elevation and that accounts for the inter-seasonal and inter-annual variability of GDE water demand. ii. Adjacent to Surface Water: Re-evaluate potential GDEs that are in proximity to a losing surface water body. The Department recommends the GSP be more conservative and all-inclusive until there is evidence that the overlying ecosystem has no significant dependence on groundwater across seasons and water year types. The Department advises that these riparian GDE beneficial users of groundwater and surface water are carefully considered in the analysis of undesirable results and minimum thresholds for depletions of interconnected surface waters. iii. Include additional references for evaluation: The Department recognizes that NCCAG (Klausmeyer et al. 2018) provided by Califomia Department of Water Resources (CDWR) is a good starting reference for GDE's; however, the Department recommends the GSP include additional resources 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 (CNDDB) (2019B); the California Native Plant Society (CNPS) Manual of Califomia Vegetation (CNPS 2019A); the CNPS California Protected Areas Database (CNPS 2019B); the U.S. Fish ahd 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), and Witham et al. (2014).	Thank you for your comments. All comments are given due consideration.

64	California Department of Fish and Wildlife	4, 4.2, 5, 5.7	4-5, 4-48, 4-56, 4-59, 5-32	Sustainable Management Criteria. Section 4. Sustainable Management Criteria, 4.2 Groundwater Levels and Section 5 Monitoring Network 5.7 Depletion of Interconnected Surface Water (page 5-32). The Groundwater Level and Interconnected Surface Water sustainable management criteria demonstrate limited consideration of undesirable results for environmental beneficial uses and users of groundwater and interconnected surface waters. a. Issue: Groundwater Level 'undesirable results' and 'effects of undesirable results' do not specify impacts to environmental beneficial users such as GDE's, nor does this section explicitly identify fish and wildlife or habitat as beneficial users of interconnected surface water. Depletions of interconnected surface water 'undesirable results' also appear to disregard potential interconnected 'losing' streams (page 4-48 and see Comment #1 above), and are otherwise assumed to not exist, meaning no sustainable management criteria are developed for interconnected surface waters. Depletions of interconnected surface water 'undesirable results' and 'effects of undesirable results' do not specify potential adverse impacts to environmental beneficial users other than to identify the Kings River Fisheries Management Program as a relevant effort (page 4-56) and mention 'environmental flow proponents' as a potentially impacted party (page 4-59). The proposed sustainability criteria suggest that groundwater elevations at all representative wells in the subbasin can continue to decrease for the next 20 years, dropping further from historically low groundwater elevations during drought years, without witnessing undesirable results. The 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 "Critically Overdrafted"). However, according to the GSP, the basin has not experienced undesirable results, and for most of the basin, minimum thresholds are set above the level of expected undesirable results (page 4-4); therefore, minimum thresholds effectively allow for 20 years of groundwater table declining trends that mirror trends that contributed to the subbasin's Critically Overdrafted status. Conceptually, there is a disconnect between the subbasin's 'Critically Overdrafted' designation and the GSP's claim that the basin has not experienced undesirable results, nor will it if groundwater levels continue to decrease. The NKGSP states that the GSA does not view a well going dry as an undesirable result (page 4-5). Although CDWR will have the final decision as to what an undesirable result is considered, the Department considers a well going dry as a significant event and considers this a very undesirable result. b. Recommendation: The Department recommends the NKGSA clarify how species and habitat groundwater needs were considered in the identification of sustainable management criteria and identify specific potential adverse impacts on environmental beneficial users of groundwater (e.g., terrestrial GDE stress/loss, increased instream temperatures, etc.). The Department advises the NKGSA identify specific habitats and species that depend on groundwater in the subbasin and define for these beneficial users relevant undesirable results and related causes. Reference the Critical Species Lookbook for threatened and endangered species in your basin as well as for narrative on species and habitat groundwater dependence that can be a model for describing environmental beneficial uses and users of groundwater in the GSP. Reevaluate sustainable management criteria based on a thorough analysis of interconnectivity of 'losing' streams. The Department also recommends the NKGSA reconsider minimum thresholds and measurable objectives, accounting for undesirable results for fish and wildlife beneficial uses and users of groundwater and interconnected surface water. Design sustainable management criteria that reflect a 'Critically Overdrafted' subbasin designation by seeking to improve current groundwater conditions rather than allowing for continued aquifer depletions over the next two decades.	Thank you for your comments. All comments are given due consideration.
65	California Department of Fish and Wildlife	5, 5.7.8.3	5-39	Monitoring Network. Section 5. Monitoring Network, 5.7.8.3 Plans to Fill Data Gaps (page 5-39). Th GSP indicates that there are no identified data gaps in the depletion of interconnected surface water monitoring network. a. Issue: As previously stated above in Comment #1 , analysis of interconnected surface water appears to characterize all "losing" streams as disconnected without providing scientific support of any hydraulic connectivity between a stream and an underlying aquifer. Additionally, the interconnected surface water narrative also lacks specific estimations of the quantity and timing of streamflow depletions as specified in 23 CCR s 354.16(0. b. Recommendation: As defined in 23 CCR S 354.38 (e) "Each agency shall adjust the monitoring frequency and density of monitoring sites to provide an adequate level of detail about site-specific surface water and groundwater conditions and to assess the effectiveness of management actions. The Department recommends that the GSA identify areas and install additional shallow groundwater monitoring wells to gather the necessary information on surface water-groundwater interconnectivity near rivers and stream (including reaches designated as intermittent) to properly evaluate and characterize surface-groundwater interactions.	GSP will be changed to state that because data does not show evidence of interconnection, an estimate of the quantity and timing of depletions is not included.
66	California Department of Fish and Wildlife	5, 5.7.8.3	5-39	Monitoring Network. Section 5. Monitoring Network, 5.7.8.3	Thank you for your comments. All comments are given due consideration.

				Plans to Fill Data Gaps (page 5-39). The GSP states in Section 3.2.8 (page 3-80) Groundwater Dependent Ecosystems, "The Kings Subbasin will continue to evaluate the rejected and possible GDE's and their relationship to the groundwater conditions through monitoring efforts identified in Chapter 5 regarding groundwater level and interconnected surface water monitoring'. a. Issue: Within Chapter 5 (specifically in the Depletions of interconnected Surface Water section), there is no indication as to the planned approach to verify rejected and/or possible GDE's. The GSP needs to provide a description of how impacts to GDE's and environmental surface water users, as detected by biological responses, will be monitored and which monitoring methods will be used in conjunction with hydrologic data to evaluate cause-and-effect relationships with groundwater conditions. • b. Recommendation: As defined in 23 CCR S 354.38 (e) "Each agency shall adjust the monitoring frequency and density of monitoring sites to provide an adequate level of detail about site-specific surface water and groundwater conditions and to assess the effectiveness of management actions under circumstances that include the following: 3) Adverse impacts to beneficial uses and users of groundwater. The Department recommends that the GSA identify within the GSP areas and install additional shallow groundwater monitoring wells to gather the necessary information on surface water-groundwater interconnectivity near rivers and stream (including reaches designated as intermittent) to properly evaluate and characterize GDE's interactions with surface-groundwater.	
67	Ruth M Dahlquist-Willard (UC Coop Ext)	4	4-4, 4-5, 4-11	**Analysis of wells that may go dry under measurable objectives and minimum thresholds** The GSP states that “SGMA does not require the GSA to maintain current water levels or prevent any wells from going dry” (page 4-5) and that the NKGSA “recognizes that some shallow wells will go dry prior to water levels reaching stabilization” (page 4-11). However, the experience of Southeast Asian and other small-scale, socially disadvantaged farmers during the recent drought illustrates the social and economic consequences of shallow wells going dry due to groundwater overdraft. The minimum thresholds in the GSP were set based on the actual decline during the 2012-2016 drought (page 4-4), during which 22% of Hmong farmers surveyed by UCCE in 2015 reported that their well had gone dry. This implies that if minimum thresholds are reached under the GSP during a future period of drought and reduced surface water availability, similar problems could occur. Most Hmong farms in the UCCE survey had well depths between 80-120 feet. This matches the information in the GSP, which states that depths of irrigation wells east of the city of Fresno can be as shallow as 100 feet or less (page 3-46). Under the proposed measurable objectives and minimum thresholds, it is likely that some of these farms would lose their wells. While NKGSA is not required to prevent these shallow wells going dry, we recommend seeking funding to develop a well mitigation program similar to those being proposed for domestic wells that may go dry, in order to prevent the undesirable socioeconomic consequences of small-scale immigrant and refugee farmers losing their farms. To analyze the potential for well outages under the designated measurable objectives and minimum thresholds, we used publicly available data from the Online State Well Completion Report (OSWCR) database, which contains well location and depth information for all wells that filed Well Completion Reports in the state. We mapped all 15,781 domestic and irrigation wells within the NKGSA boundary. A 3-mile radius was assumed around each of the GSP’s designated monitoring wells (since we did not find it otherwise specified in the Plan), and we compared the MOs and MTs set for each monitoring well to the depths of the wells within the 3-mile buffer. We focused only on agricultural wells. All wells where the total depth is less than the MO or MT for the closest monitoring well are assumed to go dry if those MOs and MTs are met. • Our analysis estimated that, at a *minimum*, 33 agricultural wells will go dry under the proposed MOs, and 75 agricultural wells would go dry under the proposed MTs. These represent 2.8% and 6.4% of all agricultural wells in the GSA, respectively. Many Southeast Asian farmers are renting land on parcels with older wells that are less likely to be recorded in the database. The maps in figures 1 and 2 show the spatial analysis of agricultural wells that will go dry under the MOs and MTs for each monitoring well. We interpret these numbers as an *underestimate* of the potential well outages given the following limitations of the data available for the following reasons: 1) The analysis relies on total completed depth information of the well, but wells will go dry before hitting their absolute depth; 2) The OSCWR database is incomplete and may be missing older wells or wells where the well completion reports were not filed; 3) The analysis could not be completed for over 300 wells that were either missing information about total completed depth information (about 200 agriculture wells in the GSA boundary) or fell outside of the 3-mile radius around a monitoring well (141 agriculture wells in the GSA boundary).	Thank you for your comments. All comments are given due consideration. GSP changed in 4.2.2.3 to discuss analysis of the impacts of the water level measurable objectives and minimum thresholds on domestic wells.

68	Ruth M Dahlquist-Willard (UC Coop Ext)			**Effects of GSA operational costs and project costs on small farms** It is beneficial to small farms that they will not need to sign up or register to be members of NKGSA, as this prevents adding to the already substantial membership and reporting requirements from other agencies and regulatory programs in the state. Small-scale farmers will likely pay GSA operational costs through increased property tax assessments paid by landowners within the Fresno Irrigation District (FID). Those owning land would pay the increased assessment directly to FID, while farmers renting land might see increases in land rental rates if the assessment is passed on to them in the cost of the lease. The financial impact of this assessment is likely to be low, at least in the early stages of SGMA implementation, although it is difficult to determine given that the amount of the assessment is not specified in the GSP. To pay project costs, the NKGSA proposes leveraging fees to landowners based on volumetric pumping if metering is available, estimated pumping if not, land area, or another method as determined by each agency (page 7-2). These new project costs could have a financial impact on small farms through increased operational costs, but the extent and severity of this impact cannot be estimated without details on magnitude and cost structures. One clear issue, however, is the information asymmetry between landowners and renters (who are often small-scale, socially disadvantaged farmers) that is implicit with this management plan, and which we believe NKGSA should work to address. Despite the collaborative Board structure, there is no distinct entity on the board that is likely to represent the specific interests of small-scale farmers and the unique characteristics of their farms. The NKGSA outreach committee has worked with the Asian Business Institute and Resource Center (ABIRC) and the University of California Cooperative Extension (UCCE) Fresno County to inform small-scale Southeast Asian farmers about SGMA implementation (page 2-44). However, outreach and education should not be equated with farmers providing feedback to the GSA or with participation and engagement in the decision-making process. Including representation of small-scale, socially disadvantaged farmers on additional committees, such as the technical committee and advisory committee, would improve consideration of the interests of these farmers in the implementation of the GSP.	Thank you for your comments. All comments are given due consideration.
69	Ruth M Dahlquist-Willard (UC Coop Ext)			**Effects of the GSP management plan on small farms** In addition to potential well outages if MOs and MTs are reached, the management plan has the potential to raise operational costs and limit access to groundwater through pumping restrictions. We are concerned that if implemented, these management actions could cause financial hardship to the small farming community in the NKGSA service area. However, the extent of these impacts are challenging to assess without specific details and timelines about project implementation. The GSP provides a 12-page description of potential management actions that will be used only if necessary, but does not explain the details and timelines of initiating or implementing any of the projects. We understand that this permits flexibility to the GSA to adaptively manage and determine an appropriate course of action if and when MOs and MTs are met; however the current lack of detail prevents us from analyzing how these projects may impact small-scale farmers in the NKGSA. We point out concerns about the three following management actions: ● A moratorium on new wells during periods of droughts (page 6-24) could have severe impacts on all agriculture in the GSA service area, if growers are unable to drill deeper wells to access groundwater. Small-scale farmers who rely almost entirely on groundwater, already have limited resources to adapt to decreasing groundwater levels, and may have shallower wells than their neighbors could be disproportionately limited by a moratorium on new wells. ● Additional well-head requirements with new well construction requirements and new permit criteria (page 6-15) could increase costs for small-scale farmers. Similarly, requirement of flow meters or self-reporting twice a year will require financial and/or human resources that are more limited on small-scale farms. We recommend working with local partners on grants to assist small-scale farmers with potential new infrastructure costs. ● Groundwater allocations and pumping restrictions per acre could reduce agricultural production in the area. Table 6-4 outlines five possible methods for quantifying groundwater use. Potential problems exist for small-scale, diversified specialty vegetable farms with several of the approaches. Use of flow meters will require farmers to install equipment that will have a proportionally larger financial impact on small-scale farmers if costs are not defrayed. If the irrigated area hybrid method is used, estimation of groundwater use will be difficult because crop coefficients are not established for many crops grown by small-scale farmers in the region (such as many of the Asian specialty vegetable crops), and diversified farms may contain up to 100 different crops grown in seasonal rotations. If methods that use crop type to estimate groundwater use are employed, we recommend that an estimate for groundwater use for a category such as “mixed vegetables” be developed. Also, estimation of pumping by crop does not reflect rotation with fallow areas within a farm, and might overestimate groundwater use for farmers rotating parcels within their farms.	Thank you for your comments. All comments are given due consideration. Thank you for your comments. All comments are given due consideration.

70	Ruth M Dahlquist-Willard (UC Coop Ext)	2	2-39	**Suggestions for improving outreach and participation by small-scale farmers** The NKGSA outreach plan separated beneficial users of groundwater into three categories: 1) Collaborated; 2) Consulted; and 3) Connected (page 2-39). While outreach events were conducted in collaboration with ABIRC, and one with UCCE, these events focused more on outreach than on feedback and participation, and it is not clear how input from the farmers who attended was incorporated into the development of the GSP. Outreach during GSP implementation would benefit from action items to increase communication with farmers who are harder to reach, such as developing bilingual materials or partnering with groups connected to these farmers. Adding members representing the Southeast Asian farming community and other socially disadvantaged farmers to the advisory and/or technical committees would improve participation by a diversity of small-scale farmers.	GSP Section 2.5.5 changed to include…The GSA will continue to pursue effective methods of communication with stakeholders, including rural domestic pumpers and small farmers, to provide local seasonal and annual groundwater conditions and basic groundwater and well information.
71	Local Government Commission, Audubon, Union of Concerned Scientists, etc..	2.5, 2.5.1, 3.2.5, 4.4.2	81, 84, 232-242, 463	The GSP provides a detailed description of the beneficial users in the basin. Figure 3-32, which identifies Cr(VI) concentrations by comparison with the USGS Health-Based Screening Level pf 20 µg/l , provides a misleading impression of the seriousness of the threat to drinking water quality posed by this contaminant in this subbasin. While the MCL of 10 µg/l was withdrawn, the SWRCB still has a responsibility to set the revised MCL as close to the Public Health Goal (PHG) as economically and technically feasible. Therefore, a more accurate depiction of threat would be to use the PHG of .02µg/l as the comparison level in Figure 3-32. The GSP should describe whether other beneficial uses and users of groundwater in the NKGSA area are present, including protected Lands, preserves, refuges, conservation areas, recreational areas; managed wildlife areas, and other protected lands; and Public Trust Uses, including wildlife, aquatic habitat, fisheries, and recreation. The types and locations of environmental uses, species and habitats supported, and the designated beneficial environmental uses of surface waters that may be affected by groundwater extraction in the NKGSA area should be specified in the GSP. The GSP should discuss how environmental groups were engaged during the GSP development process. To identify environmental uses and users, please refer to the following: - The NC Dataset (https://gis.water.ca.gov/app/NCDatasetViewer/) which identifies potential presence of groundwater dependent ecosystems in this basin - The list of freshwater species located in the Kings Subbasin: h ttps://groundwaterresourcehub.org/sgma-tools/environmental-surface-water-beneficiaries/. Take particular note of the species with protected status. - CDFW's California Natural Diversity Database (CNDDB) (https://www.wildlife.ca.gov/Data/CNDDB) - USFWS's IPAC report for the North Fork Kings Area of the Subbasin (https://ecos.fws.gov/ipac/) . The benefits and requirements of the Kings River Fisheries Program and the San Joaquin River Restoration Program should be discussed in the GSP.	Thank you for your comments. All comments are given due consideration.
72	Local Government Commission, Audubon, Union of Concerned Scientists, etc..	App 2-A, 2.5.1, 2.5.5, 2.5.3.2, 2.5.3.3	83, 88, 90, 92, 93, 97, 104, 113, 114, 115	The GSP includes a communication plan and details how the public was engaged through the GSP development process, including where and when meetings were held. It is important that stakeholder engagement be maintained through the development of future projects and management actions and other SGMA compliance and implementation steps.	Thank you for your comments. All comments are given due consideration.

73	Local Government Commission, Audubon, Union of Concerned Scientists, etc..			The GSP should provide the locations and depths of all domestic and public supply wells in the GSA area using the best available information. If this information is not available in the County database, it can be downloaded from the DWR-provided resource: https://www.arcgis.com/apps/webappviewer/index.html?id=181078580a214c0986e2da28f8623b37. Locations of potentially impacted wells should be provided in order to assess the well impacts specific to ACs, small water systems, and other sensitive users within the NKGSA. Refer to TNC Best Practices for Using the NC Dataset for using local groundwater data to verify whether polygons in the NC dataset are supported by groundwater in an aquifer. How the depth to groundwater contours in Figure 3-23 were developed should be further confirmed. Ideally, the wells used for interpolating depth to groundwater should be sufficiently close (<5km) to NC Dataset polygons and screened within the surficial unconfined aquifer and capable of measuring the true water table. Depth to groundwater contours should be developed by first contouring groundwater elevations measured at monitoring wells, then subtracting this layer from land surface elevations extracted from a Digital Elevation Model (DEM) to estimate depth to groundwater contours across the landscape. This will provide much more accurate contours of depth-to-groundwater along streams and other l and surface depressions where GDEs are commonly found. It is recommended that depth to groundwater data from multiple seasons and water year types are used to determine the range of depth to groundwater around NC dataset polygons, as utilizing groundwater data from one point in time (e.g., Spring 2017) can misrepresent groundwater levels required by GDEs, and inadvertently result in adverse impacts to the GDEs. Ensure that groundwater condition data prior t o t he SGMA benchmark date of January 1, 2015 is included in the analysis. The GSP should provide rationale for the 30-foot criteria and the 100-foot buffer cited in the text. The GSP should consider what vegetation is p resent in the potential GDEs and the estimated maximum rooting depths for those species. If insufficient data are available to describe groundwater conditions within or near polygons from the N C dataset, include those polygons in the GSP until data gaps are reconciled by future data collection. If there is a potential GDE near the river, the entire GDE should be included, rather than using an arbitrary 100-foot cutoff. When describing G DEs, provide information on the historical or current groundwater conditions underlying the GDEs or the ecological conditions present. Also provide an ecological inventory for all potential GDEs that includes the vegetation types or habitat types and rank the GDEs as having a high, moderate or low value; and what characterizes the rank. Identify whether any endangered or threatened freshwater species of animals and plants, or areas with critical habitat were found in or near any of the GDEs. The GSP should compile and synthesize supporting hydrological datasets and biological data for each GDE unit, and/or describe data gaps and insufficiencies. A description of the potential effects on GDEs, land uses, and property interests should also be provided. The GSP should provide or refer to depth to groundwater contour maps in Section 3.2.7. Refer to TNC Best Practices for Using the NC Dataset for best practices for completing the contouring and subsequent analysis. Also provide cross-sections at locations where there may be groundwater-surface water connection to show the relationship between the depth to groundwater and the bed of the river channel.	Thank you for your comments. All comments are given due consideration.
74	Local Government Commission, Audubon, Union of Concerned Scientists, etc..			The GSP should include multiple climate scenarios, such as single dry years and multiple dry years. The GSP should clearly identify and quantify surface water outflows and water uses for native vegetation and/or wetlands in the water budget. The GSP does not quantify the number of domestic well users or associated water demand. These demands should be included in the historical, current, and future water budgets for full consideration of all demands on the basin. The GSP should clarify whether a term is included for native or riparian vegetation evapotranspiration and for wetlands in the North Kings historical, current, and future water budgets. The GSP should also provide discussion of the potential impacts to groundwater conditions due to climate change on GDEs and aquatic ecosystems.	Thank you for your comments. All comments are given due consideration.

75	Local Government Commission, Audubon, Union of Concerned Scientists, etc..	5		The GSP does not clearly and transparently present the impact of the proposed MOs/MTs on domestic wells, DACs and other key communities within the NKGSA area, nor does it present an assessment of how many and which domestic wells are expected to go dry if the MOs/MTs are reached. Therefore, an impact analysis should be performed in the GSP to evaluate the potential impacts to subbasin wells associated with the MTs/MOs developed by the NKGSA. The GSP should describe how the monitoring network will be sufficient to address the potential correlation between groundwater level declines and biological responses, and to monitor impacts to GDEs and ISWs. To accurately characterize GDEs, clarify how the unconfined aquifer will be monitored and how many wells will be used. The GSP should also reconcile data gaps in monitoring for ISWs with specific recommendations (shallow monitoring wells, stream gauges, and nested/clustered wells) along surface water features to improve ISW mapping and inform an adequate analysis.	Thank you for your comments. All comments are given due consideration.
76	Local Government Commission, Audubon, Union of Concerned Scientists, etc..	4.2, 4.6		The GSP should include the impacts of groundwater extraction on DACs. It should also document clearly how stakeholders' input was considered in the development of URs, MOs, and MTs. The GSP should describe how the proposed approach to developing MOs/MTs is protective of the diverse drinking water users in the NKGSA and develop a proactive assistance program for potentially impacted beneficial users, including DACs, small water systems, and domestic wells, to mitigate potential future adverse impacts. At the proposed MOs, the water levels in the representative monitoring wells (RMWs) would decline up to 60 ft; at the proposed MTs, the water level in the RMWs would decline between 11 ft to 107 ft. In addition to dewatering wells, changes to groundwater flow gradients could potentially result in changes to water quality. Therefore, it is recommended that the impacts to groundwater gradients at the proposed MOs and MTs be analyzed and described in the GSP, as well as impacts to drinking water wells. Given that the subbasin is in critical overdraft, the GSP should explain how the projected additional water level declines will result in sustainable conditions for beneficial users. The GSP should describe how the degree of decreasing water level prior to reaching the UR definition is considered to be insignificant and reasonable, and how this approach is protective of beneficial users in the basin, particularly those with limited financial resources, including, but not limited to, members of DACs. The GSP should further clarify the disconnect between the UR definition for chronic lowering of water levels and the definition of MT exceedances that trigger action by the NKGSA. It is also recommended that the GSP present a thorough and robust analysis, supported by maps, that identifies: (1) what domestic wells are likely to be impacted (including partially dewatered) at the MTs and at the MOs and (2) the location of the likely impacted wells with respect to DACs and other communities and systems dependent on groundwater. Interim milestones (IMs) are not presented in Appendix 4-A. Table 4-3 of the draft GSP lists MTs and MOs for each representative monitoring well but not interim milestones for the monitoring wells. Per 23 CCR § 354.30, each agency shall establish measurable objectives, including interim milestones in increments of five years, to achieve the sustainability goal for the basin within 20 years of plan implementation. The GSP should clearly identify the specific numeric MOs and MTs for each chemical/constituent of concern at the representative monitoring wells, and present this information clearly and transparently in tables and maps so that the public and DWR may evaluate the proposed sustainability management criteria. The GSP should include GDEs and ISWs in the development of MOs and MTs for groundwater levels and depletions of ISWs. It is recommended the GSP add "potential adverse impacts to GDEs and native freshwater species" to the list of potential undesirable results presented in Section 4.2. Section 4.4 should be modified to state that overpumping and dewatering of aquitards has been identified as a potential source of elevated arsenic concentrations above drinking water standards in San Joaquin Valley aquifers. In addition, any potential undesirable results from degradation of water quality that may impact GDEs and freshwater species in the area should be discussed in this section.	GSP changed in 4.2.2.3 to discuss analysis of the impacts of the water level measurable objectives and minimum thresholds on domestic wells. GSP will call out interim milestones in table and hydrographs. GSP Table 4-7 will be revised to include MCLs, including most recent measured values. GSA staff is working with FID and other agencies in basin on response to Nature Conservancy comments.

				The analysis for potential depletion of ISWs in Section 4.6 should include all beneficial users of surface water that could be affected by groundwater withdrawals, including environmental. The GSP should also include instream flow requirements and critical habitat designations in this section and whether the measurable objectives and interim milestones will help achieve the sustainability goal as it pertains to the environment.	
77	Local Government Commission, Audubon, Union of Concerned Scientists, etc..	6		The GSP should identify the potential impacts of the proposed projects or management actions on DACs. If impacts are expected, the GSP should include plans to mitigate such impacts, calculate the estimated costs, and document the funding sources. The GSP should clarify whether the land conversion mentioned in the water budget section is part of the management actions. The GSP should include discussion of the environmental benefits and multiple benefits as criteria for assessing project priorities. The GSP should consider modifying the Management Actions to include education and outreach for protection of GDEs and ISWs, as well as specific management of these ecosystems and the species they provide for. The GSP should also include funding mechanisms for projects and management actions.	Thank you for your comments. All comments are given due consideration.
78	Self Help Enterprises, Leadership Counsel			The GSP should describe how the degree of water level lowering before meeting the UR definition is considered to be insignificant and reasonable, and how this approach is protective of beneficial users in the basin, particularly those with limited financial resources, including, but not limited to, members of DACs. The GSP should further clarify the disconnect between the UR definition for chronic lowering of water levels and the definition of MT exceedances that trigger action by the NKGSA.	GSP changed in 4.2.2.3 to discuss analysis of the impacts of the water level measurable objectives and minimum thresholds on domestic wells.
79	Self Help Enterprises, Leadership Counsel			An impact analysis should be performed in the GSP to evaluate the potential impacts to sub basin wells associated with the MTs/MOs developed by the NKGSA. Furthermore, locations of potentially impacted wells should be provided in order to assess the well impacts specific to DACs, small water systems, and other sensitive users within the NKGSA.	GSP changed in 4.2.2.3 to discuss analysis of the impacts of the water level measurable objectives and minimum thresholds on domestic wells.
80	Self Help Enterprises, Leadership Counsel			GSP should describe how approach is protective of the diverse drinking water users in the NKGSA. And develop an assistance program for potentially impacted beneficial users, including DACs, small water systems, and domestic well users to mitigate adverse impacts.	Thank you for your comments. All comments are given due consideration.
81	Self Help Enterprises, Leadership Counsel			Given that the sub basin is in critical overdraft, the GSP should explain how the projected additional water level declines will result in sustainable conditions for beneficial users. The GSP should also consider and quantify both the potential dewatering of wells and the increased pumping costs associated with the increased lift at the projected water levels in order to more fully and transparently consider the impacts to beneficial users	GSP changed in 4.2.2.3 to discuss analysis of the impacts of the water level measurable objectives and minimum thresholds on domestic wells.
82	Self Help Enterprises, Leadership Counsel			It is recommended that the impacts to groundwater gradients at the proposed MOs and MTs be analyzed and described in the GSP, as well as impacts to drinking water wells	GSP changed in 4.2.2.3 to discuss analysis of the impacts of the water level measurable objectives and minimum thresholds on domestic wells.
83	Self Help Enterprises, Leadership Counsel			Recommend that the GSP present a thorough and robust analysis, supported by maps, that identifies: 1) what domestic wells are likely to be impacted (including partially dewatered) at the MTs and at the MOs and 2) the location of the likely impacted wells with respect to DACs and other communities and systems dependent on groundwater	GSP changed in 4.2.2.3 to discuss analysis of the impacts of the water level measurable objectives and minimum thresholds on domestic wells.

84	Self Help Enterprises, Leadership Counsel			However the details of this evaluation and the potential actions [when a minimum threshold is exceeded] are not identified in the draft GSP. The draft GSP should clearly identify the potential actions that would be implemented and the funding source(s) that would be utilized if such actions are implemented	GSP changed in 6.1 to state that…If project development is not able to achieve the interim sustainability milestones or if minimum thresholds are exceeded, then management actions or programs will be needed. And text in 6.3 changed to state… The NKGSA and its member agencies believe sustainability will be reached with the projects identified in Section 6.2, however a listing of management actions is included should interim milestones not be reached or minimum thresholds exceeded.
85	Self Help Enterprises, Leadership Counsel			Water level interim milestones are not included in Appendix 4-A or Table 4-3.	GSP will call out interim milestones in table and hydrographs.
86	Self Help Enterprises, Leadership Counsel			The GSP should clearly identify the specific numeric MOs and MTs for each COC at the RWMs and present this information clearly and transparently in tables and maps so that the public and DWR may evaluate the proposed sustainability management criteria.	GSP Table 4-7 will be revised to include MCLs, including most recent measured values.
87	Self Help Enterprises, Leadership Counsel			The GSP should fully consider all available water quality data in its analysis of groundwater conditions and the hydrogeologic conceptual model. The wealth of available data should not be omitted because of its volume, given that it could add substantial value in understanding spatial and temporal trends in water quality.	The NKGSA has developed voluminous data and will continue to develop more data for evaluating and implementing the GSP.
88	Self Help Enterprises, Leadership Counsel			The GSP should explicitly describe how the risks of inadvertent water quality impacts associated with projects will be evaluated and monitored as a part of each identified project and management action.	Thank you for your comments. All comments are given due consideration.
89	Self Help Enterprises, Leadership Counsel			The GSP should clearly demonstrate how the proposed water quality monitoring network in the eastern portion of the City of Fresno is sufficient to monitor for impacts to beneficial users in this area.	Thank you for your comments. All comments are given due consideration.
90	Self Help Enterprises, Leadership Counsel			The GSP identifies RMWs for water level and water quality in Tables 4-3 and 4-7 but does not include well construction information for these wells. Pursuant to 23 CCR Section 352.4, this information is required to be provided for all monitoring wells.	GSP will be changed to identify which wells have construction info and clarify its plan for obtaining construction info for wells lacking this info.
91	Self Help Enterprises, Leadership Counsel			The GSP should specifically identify the RMW owners and operators and identify a plan to obtain adequate monitoring data, should for any reason the well owners do not obtain and make this data available to the NKGSA.	Thank you for your comments. All comments are given due consideration.

92	Self Help Enterprises, Leadership Counsel			The draft GSP indicates the NKGSA has no control over or access to the water quality RMWs. The GSP should identify what plans and mechanisms are in place to allow for this contingent, increased water quality sampling at the water quality RMWs, should water quality MTs be exceeded.	Thank you for your comments. All comments are given due consideration.
93	Self Help Enterprises	2.5	2-36, 2-37	Expand Section 2.5 of the GSP, (page 2-36 and 37) to include a more detailed description of the region's broad and diverse groundwater users and DACs' dependence on groundwater for drinking water purposes. For example: *The NKGSA area includes over 8,300 domestic wells, seven DWR designated DACs (i.e., Fresno, Kerman, Biola, Calwa, Malaga, Mayfair, and West Park) with a collective population of over 537,000 people reliant on groundwater for drinking water use, including several communities dependent on private wells, such as the community of Easton whose population is over 2,300 people. Other severely disadvantaged communities include Rolinda, Double L Neighborhood, Centerville, Double L Mobile Ranch Park, Britten, Daleville, and Communities 152, 168, 180 and 192. Overall, within the NKGSA area, there are 107 community water systems, 101 of which have less than 300 service connections but collectively serve over 88,000 people. NKGSA population is also diverse, including a significant non-English speaking population and an active group of Southeast Asian including Hmong growers.*	GSP will be modified to include additional descriptions of DACs
94	Self Help Enterprises	2.5		Develop and incorporate a formal GSP Implementation Outreach and Engagement Strategy. When developing such a strategy, the NKGSA should evaluate the outreach and engagement strategies utilized during GSP development phase, success and constraints encountered and develop recommendations to improve public participation during plan implementation. Effective outreach and engagement strategies for DACs, include hosting localized neighborhood evening meetings, providing bilingual (English and Spanish) materials, interpretation services, tailoring materials to the intended audience. All communication materials should include key messages, visuals and information that is relevant to the groundwater user. We recommend identifying and working with known and respected community leaders, community based organizations and nonprofits. Nonprofits working within the NKGSA boundaries include but are not limited to, LCJA, SHE, and California Rural Legal Assistance. The GSP Implementation Outreach and Engagement Strategy should include a DAC communications campaign and regular and ongoing workshops in order to solicit feedback, keep the public informed and engaged, and establish trusting relationships. At a minimum, the GSP implementation outreach and engagement strategy should proactively provide information to the public during plan updates, and prior to critical decisions. Critical decision points may include but are not limited to the adoption of groundwater fees, development and adoption of the Groundwater Allocation Framework, and the Pumping Restriction Program.	GSP Section 2.5.5 changed to include…The GSA will continue to pursue effective methods of communication with stakeholders, including rural domestic pumpers and small farmers, to provide local seasonal and annual groundwater conditions and basic groundwater and well information.
95	Self Help Enterprises	2.5		Fund appropriate and effective outreach strategies to engage diverse groundwater users (i.e. DAC residents served by public water systems and private domestic wells and others). Account for DAC outreach, engagement and translation services when establishing and approving operating budgets and enacting groundwater fees and applying for state funding. Utilize appropriate consultants. The NKGSSA should hire qualified consultants who have a record of proven demonstrated success in and clear qualifications for working with these stakeholders.	GSP Section 2.5.5 changed to include…The GSA will continue to pursue effective methods of communication with stakeholders, including rural domestic pumpers and small farmers, to provide local seasonal and annual groundwater conditions and basic groundwater and well information.
96	Self Help Enterprises	3.2		Provide the locations and depths of all domestic and public supply wells in the GSA area using the best available information. If this information is not available in the County database, at least some of this data can be downloaded from the DWR-provided resource	Thank you for your comments. All comments are given due consideration.
97	Self Help Enterprises	3.2		Utilize our technical focused review, (in particular Figures 2A, 2B, and 3) the Draft Tulare Kern Funding Area Preliminary Needs Assessment report and the NKGSA Water Budget to develop a more detailed description of the historical and currently known groundwater challenges impacting the drinking water supplies of DACs. The GSP should provide a better description of the unique challenges that S/DACs face, including the susceptibility to groundwater changes due to their shallower wells and financial constraints. The locations of potentially impacted wells should also be provided in order to assess the well impacts specific to DACs, small water systems, and other sensitive users within the NKGSA.	Thank you for your comments. All comments are given due consideration.
98	Self Help Enterprises			Include a description of the impacts experienced during the 2012-2016 drought. A good understanding of what happened, including which programs and strategies worked well to effectively address impacts to drinking water and what strategies could be improved, can aid with the development of management actions that adequately prepares the GSA to prevent and mitigate the impacts of future droughts. According to the CA Household Water Supply Shortage Report, which provides an estimate of the cumulative number of household water	Thank you for your comments. All comments are given due consideration.

				supply shortages or problems occurring from dry or failing groundwater wells or surface water supplies through January 6, 2019, a total of 77 households have reported outages and 21 households still have verified active outages in Fresno County. Due to the volunteer nature of the reporting and limitations on reporting agencies, data discussed in the CA Household Water Supply Shortage report are undoubtedly under-representative of all shortages to have occurred. In addition, reports are received from multiple sources and there are occasionally errors and omissions, non- household water supply reporting, and under-reporting. Self-Help Enterprises (SHE), assisted families and communities in the San Joaquin Valley in pursuing funding, interim and long-term solutions during the drought, has helped 104 homes and 7 schools in Fresno County to receive bottled water, install 86 water tanks as a temporary measure (2 water tanks are still pending approval). In addition, SHE assisted 44 families with financing new water wells (3 water wells are still pending approval) as a long-term solution. To document specific impacts within the NKGSA (i.e. number of wells that were dewatered, number of households that participated in the interim household water tank program and costs associated with emergency drinking water services, grants/loan awarded for replacement wells, and current households without a permanent source of water), please consider seeking additional information from Fresno County and the drought team at Self-Help Enterprises. The GSA should also evaluate whether there is a need to conduct further analysis in order to determine whether historical, current and/or future impacts to these drinking water supplies are associated with or will be caused by changes in groundwater levels, plume migration, increase of groundwater quality degradation, and subsidence.	
99	Self Help Enterprises	3.3		Under Groundwater Pumping for Irrigation (draft GSP, page 3-94), include a summary of the information on land use and crop evapotranspiration so that these values can be assessed.	Thank you for your comments. All comments are given due consideration.
100	Self Help Enterprises	3.3		Under Uncertainty in Water Budgets (draft GSP, page 3-104), present the uncertainty in groundwater storage change due to a plausible range in groundwater storage properties and compare that to the storage change calculated from the water budget. We also recommend clarifying in the text whether NKGSA applied a water budget correction factor to the current and future water budgets with the intent to align the water budget storage change with the storage change estimated from water levels and groundwater storage properties.	Thank you for your comments. All comments are given due consideration.
101	Self Help Enterprises	3.3		In Table 3-10, page 3-112, please include more detailed information on how the future water demand assumptions were determined for each water agency, including the underlying population growth estimates and crop patterns.	Thank you for your comments. All comments are given due consideration.
102	Self Help Enterprises	3.3		To develop the projected water budget (draft GSP Section 3.3.10), include multiple climate scenarios available from DWR climate change datasets: extreme warming scenario, and the wetter, moderate warming scenario.	Thank you for your comments. All comments are given due consideration.
103	Self Help Enterprises	3.3		Include a discussion and analysis in the GSP evaluating the projected water budget conditions, specifically focusing on climate change impacts for domestic well users, S/DACs, and community water systems.	Thank you for your comments. All comments are given due consideration.
104	Self Help Enterprises	4.2		Include a more clear statement on groundwater quality and human consumption in the final language for the sustainability goal. This will make the statement stronger, demonstrate to residents that their water needs are a priority, and overall help the GSP meet SGMA standards. Kings Subbasin GSAs should also consider including a more broadly-stated description towards what exactly the goal will strive to fulfill. One such example would be: "*Through implementation of projects and management actions tailored to each GSA, the broadly-stated Sustainability Goal for the Kings Subbasin is to ensure that groundwater production will preserve the viability of cities and existing agricultural enterprises as well as the viability of school districts, smaller communities, and households relying on shallow domestic wells. The Goal will also strive to fulfill the water needs of existing populations that commit to continued economic and population growth within the Subbasin boundaries.*"	Thank you for your comments. All comments are given due consideration.
105	Self Help Enterprises	4.2		Document clearly how stakeholders' input was considered in the development of Sustainability Goal.	Thank you for your comments. All comments are given due consideration.

106	Self Help Enterprises	4.3		Document clearly how stakeholders' input was considered in the development of URs, MOs, and MTs.	Thank you for your comments. All comments are given due consideration.
107	Self Help Enterprises	4.3		Revise the UR definition for chronic lowering of water levels of "*when either the water level has declined to a depth that a new productive well cannot be constructed or when the water level has declined to a depth that water quality cannot be treated for beneficial use"*(draft GSP Section 4.2.1.1) to a definition that is consistent with the objectives of SGMA, the Human Right to Water, the MOs and MTs and one that takes into account input from all groundwater users, including DACs, residents served by private domestic wells and other sensitive beneficial users. Revising the definition will strengthen the GSP, meet SGMA regulations and be consistent with the MT/MOs definition. It will also demonstrate to residents that their water needs were incorporated.	Thank you for your comments. All comments are given due consideration.
108	Self Help Enterprises	4.3		Analyze and describe in the GSP the impacts to groundwater gradients and drinking water wells at the proposed MOs and MTs and reconsider the approach to set minimum thresholds and measurable objectives for groundwater levels. The revision of sustainable management criteria should be based off a thorough and robust analysis, supported by maps, that identifies: (1) whether changes in groundwater levels may be exacerbated in specific areas by pumping volume or location, conjunctive management or other forms of active management as part of GSP implementation; (2) what domestic wells are likely to be impacted (including partially dewatered) at the MTs and at the MOs and (3) the location of the likely impacted wells with respect to DACs and other communities and systems dependent on groundwater.	GSP changed in 4.2.2.3 to discuss analysis of the impacts of the water level measurable objectives and minimum thresholds on domestic wells.
109	Self Help Enterprises	4.3		Include the interim milestones for water level for each monitoring well on the hydrographs in Appendix 4-A and Table 4-3 of the draft GSP. Per 23 CCR § 354.30, each agency shall establish measurable objectives, including interim milestones in increments of five years, to achieve the sustainability goal for the basin within 20 years of plan implementation.	GSP will call out interim milestones in table and hydrographs.
110	Self Help Enterprises	4.3		Identify the specific numeric MOs and MTs for each contaminant of concern at each of the RWMs, and present this information clearly and transparently in tables and maps so that the public and DWR may evaluate the proposed sustainability management criteria.	GSP will be changed on Table 4-7 to include MCLs and recent data results.
111	Self Help Enterprises	4.3		Develop a warning system that informs NKGSA and stakeholders when contaminants of concern have reached 80% of the MCL and when there is an increasing trend in groundwater quality degradation near drinking water users. This system is especially important for wells with COC concentrations less than 80% the MCL that experience impacts due to groundwater management activities. Based on recent conversations with GSA staff, consultants and members, we understand that the GSA intends to coordinate with the well owner/operator to discuss possible reasons for change and may require additional monitoring. However, there are several limitations with this approach. Well owners/operators may not have the appropriate monitoring systems, technical expertise or financial resources to determine a reason for increasing groundwater degradation and, ultimately, it is the responsibility of NKGSA to implement monitoring strategies and actions plan capable to evaluate increasing trend in groundwater quality degradation. For wells with contaminant levels approaching the MCL or if there is an increasing trend in groundwater quality degradation near drinking water users, NKGSA should consider taking the following actions: notify nearby domestic well owners and community water systems; undertake an analysis to pinpoint the cause; provide information to groundwater users regarding impacts of groundwater management actions; reassess pumping allocations; and/or if the contaminant is clearly under the purview of another agency, confer with that agency to confirm a plan to address the groundwater quality problem.	GSP changed on page 4-32, to state that actions will be conducted as adverse water quality changes are observed to prevent an undesirable result.
112	Self Help Enterprises	4.3		Clarify how the GSA plans to align the sustainable management criteria with any emerging contaminants of concern and new MCLs.	Thank you for your comments. All comments are given due consideration.
113	Self Help Enterprises	4.3		Clarify how plume migration will be evaluated and monitored by NKGSA.	Thank you for your comments. All comments are given due consideration.
114	Self Help Enterprises	5		Identify which monitoring wells will be used to assess impacts to drinking water wells caused by changes on groundwater levels and quality and describe how that assessment will be conducted. As required by 23 CCR § 354.28, DWR will evaluate the ability of the proposed monitoring	GSP will be changed to include the GSAs efforts to ensure each water quality

				program to properly assess impacts to beneficial users of groundwater and to protect beneficial users within the subbasin. In particular, it is important to clarify how the NKGSA plans to monitor and assess drinking water wells at risk of dewatering or of further contamination.	sampling event results in a complete set of information including water level monitoring, when possible, at the time of sampling. The water level monitoring wells closest to the drinking water well with a water quality concern will be used to evaluate how the water level may have contributed to a change in contaminant level.
115	Self Help Enterprises	5		Expand water quality monitoring network or clearly demonstrate how the proposed network in the eastern portion of the City of Fresno is sufficient to monitor for impacts to beneficial users in this area. According to the draft GSP Basin Setting, concentrations of DBCP and TCP exceeding MCLs are present in the area near the shared border of Clovis and Fresno, and this area does not appear to be sufficiently covered by the proposed water quality monitoring network.	Thank you for your comments. All comments are given due consideration.
116	Self Help Enterprises	5		Clarify how NKGSA plans to increase water quality sampling at the water quality representative monitoring wells should water quality MTs be exceeded if, based on the information presented in the draft GSP, the NKGSA has no control over or access to the water quality RMWs (draft GSP Section 4.4.3.1). Based on recent conversations with the GSA, we understand that the GSA intends to conduct outreach to the well owners and operators of public water systems that have been identified as RMWs in the draft GSP and will be considering development of a policy to ensure data is available for each RWM. This policy should be developed within the first year following submittal of GSP and should not rely solely on the PWS to provide additional information. The GSA should establish a GSA boundary-wide funding mechanism to cover potential costs associated with additional monitoring. Doing so would better position the GSP to comply with SGMA and not limit financial impacts to low income well owners and public water systems serving DACs.	Thank you for your comments. All comments are given due consideration.
117	Self Help Enterprises	6.2 & 6.3		Identify the potential impacts of the proposed projects on DACs in Table 6-1 and the proposed management actions in Section 6.3. If impacts are expected, the GSP should include plans to mitigate such impacts, calculate the estimated costs, and document the funding sources. The GSP should clarify whether the land conversion mentioned in the water budget section is part of the management actions.	Thank you for your comments. All comments are given due consideration.
118	Self Help Enterprises	6.2 & 6.3		Describe how the risks of inadvertent water quality impacts associated with projects will be evaluated and monitored as a part of each identified project and management action. We recommend the NKGSA consider developing a set of criteria for recharge projects that prevent unintended impacts to drinking water and allows early consultation and collaboration between project proponents and the GSA. For example, the GSA could consider requiring water quality monitoring and soil sampling through which water will percolate to ensure that contaminated soils or contaminated surface water do not degrade groundwater. It is also recommended that strategies be identified that can avoid/prevent/mitigate for any potential short and/or long term impact to drinking water wells, including domestic wells. For more information please refer to the guide, Protecting Drinking Water Quality Under SGMA	GSP changed in 1st paragraph of 6.1 to include… The NKGSA will also be an active participant and reviewer of proposed project impacts through the project development and CEQA process.
119	Self Help Enterprises	6.2 & 6.3		Include a map that overlays all of the potential recharge projects onto one map and include the location of DAC, domestic wells, and public water systems. This would help stakeholders to effectively evaluate the collective potential benefits or impacts of recharge projects for drinking water users in the NKGSA.	Thank you for your comments. All comments are given due consideration.
120	Self Help Enterprises	6.3.3		Further clarify the circumstances and criteria for the implementation of a groundwater allocation management action in NKGSA (draft GSP, page 6-22).	Thank you for your comments. All comments are given due consideration.
121	Self Help Enterprises	6.3.3		Consider the proposed analysis and framework development to be of high priority and, thus, be conducted within the first year of GSP implementation.	Thank you for your comments. All comments are given due consideration.

122	Self Help Enterprises	6.3.3		Include appropriate provisions that ensure the protection of important drinking water supplies for small water systems serving disadvantaged communities. Key considerations for establishing such a program are provided in Appendix B.	Thank you for your comments. All comments are given due consideration.
123	Self Help Enterprises			Provide a robust layout and work plan detailing the schedule and actions that will be required to develop a Drinking Water Assistance Management Action. A Drinking Water Well Assistance Program could include a combination of different strategies including: replacing impacted wells with new, deeper wells, connecting domestic well users to a nearby public water system, or providing interim bottled water. A plan to reestablish the emergency water tank program paired with a bottled water delivery may be an appropriate short-term solution, but is not an adequate long-term solution. Key considerations for establishing such a program are provided in Appendix C.	Thank you for your comments. All comments are given due consideration.
124	Self Help Enterprises			Preventing Common DAC Water Planning and Implementation water challenges - NKGSA's Responsibility to Comply with SGMA Exempt private well communities and water systems serving DACs from GSA use permits and penalty fees and from the proposed estimated groundwater impacts framework. Considering their small water usage, the NKGSA should consider exempting these vulnerable groundwater users from any GSA fees and from the proposed estimated groundwater impacts framework to support their efforts to provide affordable and safe water. If the NKGSA considers implementing a penalty and/or fee for agencies or stakeholders that do not mitigate for their estimated groundwater impacts, at a minimum the NKGSA should consider 1) creating a more flexible warning and appeal process with these users, 2) proactively assisting small drinking water systems in project development and securing funding, and 3) conditional forgiveness and reduction of penalties. This would encourage transparency and working collaboratively with the NKGSA to take corrective actions addressing the underlying causes of overuse. The NKGSA should establish a formal funding mechanism in order to prevent common DAC water planning challenges and in order to ensure proper compliance of SGMA. Specifically, the NKGSA should consider establishing a technical assistance fund that can be used by the County of Fresno for the benefit of households relying on private domestic wells, schools operating their own water systems and or public water systems serving DACs. The technical assistance fund could fund project development actions, Proposition 218 studies, water quality monitoring/ investigations and DAC outreach and engagement activities. We believe such funding could be utilized to prevent common DAC water planning challenges experienced in other water management programs (i.e. Integrated Regional Water Management). This action will also enable the GSA to ensure proper and prompt compliance with SGMA.	Thank you for your comments. All comments are given due consideration.
124	Leadership Counsel for Justice & Accountability			**North Kings GSA is responsible for the disproportionate and disparate impacts that its policies and activities will have on domestic well users and disadvantaged communities.** North Kings GSA must prioritize drinking water as an essential pillar of the proposed groundwater sustainability plan. The Draft GSP erroneously attempts to avoid responsibility for significant and disparate impacts on protected groups resulting from its actions. The draft North Kings GSP states that, " [w]ithout SGMA and the proposed incremental mitigation by the NKGSA, these wells would have gone dry sooner, requiring the landowner to deepen existing wells." With this point, the GSA seeks to evade responsibility for drinking water impacts from its policy decisions. This stance is incorrect, however; while in the past there has been no limitation on the right to pump groundwater, SGMA establishes a new regime in which the state has recognized that unlimited pumping harms this common good and that pumping therefore must be regulated. The GSAs are now tasked with determining how to regulate the use and management of groundwater, and must do so in a way that complies with state law. Under SGMA, the GSA is tasked with managing groundwater in a way that does not cause "significant and unreasonable impacts" to the beneficial uses and users of groundwater in the subbasin. The GSA's activities cannot avoid impacts only on certain types of beneficial users; under SGMA it must "consider the interests of" an enumerated list of all types of beneficial users, including domestic well users and disadvantaged communities on domestic wells and community water systems. Furthermore, state law provides that no person shall, on the basis of race, national origin, ethnic group identification, and other protected classes, be unlawfully denied full and equal access to the benefits of, or be unlawfully subjected to discrimination under, any program or activity that is conducted, operated, or administered by the state. In addition, the state's Fair Employment and Housing Act guarantees all Californians the right to hold and enjoy housing without discrimination based on race, color, or national origin. Lastly, the Department of Water Resources is required to consider the Human Right to Water in its evaluation of the GSA's proposed Groundwater Sustainability Plan, so the drinking water impacts of the GSP are of utmost importance in its approval	Thank you for your comments. All comments are given due consideration.

				Small disadvantaged communities of color within the San Joaquin Valley are disproportionately impacted by unsustainable groundwater use, falling groundwater tables, dry drinking water wells, subsidence, and water quality degradation. As described in more detail below, and analyzed in the attached Focused Technical Review, the proposed sustainable management criteria will cause harm to drinking water for disadvantaged communities and domestic well users by putting their water supply at risk of dewatering and further pollution due to lack of water quality oversight. Furthermore, there are no projects or management actions proposed in the Draft GSP to prevent or mitigate these drinking water impacts. The negative impacts discussed in this letter, which will be allowed by the Draft GSP, will therefore be disproportionately felt by low income communities of color, and are thus discriminatory on the basis of race, color, ancestry, and national origin. In order to prevent disparate impacts, the North Kings GSA must reassess the GSP's potential disparate impacts and include robust and proactive policies, projects, and management actions to protect vulnerable disadvantaged communities and domestic wells from disparate impacts.	
125	Leadership Counsel for Justice & Accountability			**Inadequate Transparency, Public Process, Consideration of Public Input and Representation Undermine the Value and Efficacy of the Draft GSP** The Draft GSP incorrectly states that our organization "directly or indirectly" represented disadvantaged communities "on the North Kings GSA Board of Directors." We would like to clarify that we did not have a vote on the board, and were not able to engage with the GSP process consistently due to our limited funding and capacity. While we were invited to be a part of the GSA's outreach committee, our capacity to engage in GSP development was hindered because the North Kings GSA denied our request for a support letter which would have allowed us to be active participants in this process. A support letter from the GSA was a requirement for use of Prop 1 funding. Furthermore, to the best of our knowledge, the North Kings GSA never conducted outreach to the communities we work with in the GSA area. The GSA conducted outreach in Northern Fresno and West Park, but did not reach out to many other communities in disadvantaged areas in and around Fresno. If the GSA had approved our funding, we would have been able to collaborate with the GSA to engage communities in Britten Avenue, Three Palms, and neighborhoods in and around West Fresno as well as the broader South Fresno community.	Thank you for your comments. All comments are given due consideration.
126	Leadership Counsel for Justice & Accountability			**The Monitoring Network Is Inadequate With Respect to Groundwater Levels and Groundwater Quality** The GSA's Monitoring Network is insufficient because its representative monitoring wells do not cover the entirety of the subbasin, and will not detect impacts on many beneficial users. In shaping its monitoring network, the GSA must consider the interests of beneficial users including domestic well owners and disadvantaged communities, and must avoid disparate impacts on protected groups pursuant to state law. The Draft GSP lacks representative monitoring wells in areas of the subbasin where drinking water users may be particularly vulnerable to groundwater supply and quality issues, leaving the GSA with no ability to measure and avoid significant and unreasonable impacts to those users. The GSA must add representative monitoring wells and prioritize measures to address these data gaps. The insufficiency of the representative monitoring network poses a significant threat to the validity of the plan at large, and therefore must be addressed immediately.	Thank you for your comments. All comments are given due consideration.
127	Leadership Counsel for Justice & Accountability			**Representative Monitoring Wells for Groundwater Levels** Pursuant to 23 CCR § 352.4, the draft GSP is required to include well construction information for all monitoring wells. Without well construction information for monitoring wells included in the GSP, the public and DWR cannot evaluate if the monitoring wells are adequate for evaluating water levels relative to the measurable objectives and minimum thresholds over the long term. Additionally, the Draft GSP acknowledges that they have insufficient data for unincorporated areas on domestic wells, but does not propose a substantial plan to fill that data gap. They propose a suite of options to fill the data gap, but do not commit to any of them. Additionally, they do not include a substantive timeline as to when this data gap will be filled and instead elected to include a general 2025 deadline, by which they will "either collect information on these wells or identify other wells to be used instead". To ensure that the representative wells within the monitoring network accurately monitor impacts to groundwater management for drinking water beneficial users, and does not create a disparate impact on protected groups, we make the following recommendations: • The draft GSP must include well construction information for monitoring wells in order for the public and DWR to be able to evaluate the adequacy of the monitoring network.	GSP will be modified to include well construction info in Table 4-3 for the wells that construction information is available for, and clarify its plan for obtaining the well construction info for wells with no construction info.

				• Commit to a plan to fill data gaps in the GSP, and include an aggressive timeline to ensure prompt implementation of the plan. The above plan should include installation of representative monitoring wells measuring levels in DAC areas not currently covered by the monitoring network.	
128	Leadership Counsel for Justice & Accountability			**Representative Monitoring Wells for Groundwater Quality** As per the Draft GSP, the representative monitoring network will be relying on selected public wells to monitor for groundwater quality. As stated in Section 5.5.1 of the draft GSP, "publicly available groundwater quality data from selected representative wells will be obtained annually and evaluated against sustainable management criteria." The Draft GSP has no discussion regarding access agreements for water quality representative monitoring wells. Therefore, we understand that the North Kings GSA plans to rely solely on water quality data collected by other agencies for monitoring compliance with groundwater quality sustainable management criteria. While these wells will integrate existing public water system monitoring into the GSA's monitoring network, it will not capture the impact of groundwater management activities on groundwater quality for domestic wells and disadvantaged community water systems. The Draft GSP shows that there are many known contamination plumes in the GSA area. Since domestic wells are most vulnerable to groundwater contamination, and least able to treat for harmful drinking water contaminants, the GSA must ensure that its monitoring network captures groundwater quality impacts on domestic wells. Section 4.4.3.4 of the draft GSP states that "If an undesirable result occurs with regard to groundwater quality, actions may include increased frequency of monitoring well sampling". However, based on the information presented in the draft GSP, the North Kings GSA has no control over or access to the water quality representative monitoring wells. Choosing to only include public well data impacts the North Kings GSA's ability to adequately address contamination when it is detected and gives the GSA no oversight of how, when, and to the degree of accuracy, the monitoring is occurring. Finally, in the Draft GSP, the North Kings GSA states that there are no data gaps in regards to groundwater quality. However, concentrations of DBCP and TCP exceeding MCLs are present in the area near the shared border of Clovis and Fresno, and this area does not appear to be sufficiently covered by the proposed water quality monitoring network. In general, the location of the water quality representative monitoring wells appear to be inconsistent with concentrations of contaminants of concern over MCLs as identified in Figures 3-27 through Figure 3-32 of the draft GSP. The GSA must expand its monitoring network to cover this area where contamination exists and could increase or spread. To ensure that the representative monitoring network is protective of groundwater quality of all users in the basin, the GSA should do the following: • The GSP should identify what plans and mechanisms are in place to allow the GSA to collect more frequent groundwater quality testing. • In order to make sure the management actions of the GSA are not impacting groundwater quality, the GSA must do its own sampling in areas where domestic wells are located. • In order to make sure the GSA has access to monitoring and testing water quality, the North Kings GSA could also consider conducting its own water quality analysis of wells and establish access agreements to water quality representative monitoring wells. The GSP should include a clear plan for expanding its representative monitoring wells in the eastern portion of the City of Fresno, and clearly demonstrate how the monitoring network is sufficient to monitor for impacts to beneficial users in this area.	GSP will be modified to include well construction info in Table 4-7 for the wells the GSA has construction information for.
129	Leadership Counsel for Justice & Accountability			**Confusion in Representative Monitoring Chapter** It is not clear which wells in the monitoring network will be used for monitoring which sustainability indicators from the maps provided in the Draft GSP. In order for the public and DWR to evaluate whether the monitoring networks will adequately detect impacts to beneficial users in the GSA area, the GSA must include separate maps and provide data for the wells that will be monitoring for compliance with each sustainability indicator. The Draft GSP also does not make it clear which wells will be used as general monitoring wells, and which wells will be used for measuring compliance with the sustainable management criteria. The GSA must include make this distinction clear by labeling the wells clearly in its maps of the monitoring networks for each sustainability indicator. In order to make sure information about the monitoring network is presented in a clearly and concisely, the GSA should do the following: • Include separate maps of the monitoring sites and wells that will be monitoring for compliance with each sustainability indicator.	Thank you for your comments. All comments are given due consideration.

				The GSA must clarify which wells will be monitoring for compliance with the sustainable management criteria for each sustainability indicator.	
130	Leadership Counsel for Justice & Accountability			**The Draft GSP's Sustainable Management Criteria for Groundwater Levels are not Adequate** The sustainable management criteria for groundwater levels must be made after considering the interests of all beneficial user groups, including domestic well users and disadvantaged communities. These policy decisions must also avoid disparate impacts on protected groups pursuant to state and federal law. The North Kings GSA area includes over 8,300 domestic wells, seven DWR- designated disadvantaged communities (i.e., Fresno, Kerman, Biola, Calwa, Malaga, Mayfair, and West Park) with a collective population of over 537,000 people, and the community of Easton, whose population of over 2,300 is dependent on private wells for drinking water. The North Kings GSA also includes 107 community water systems, 101 of which have less than 300 service connections but collectively serve over 88,000 people. Despite this broad and diverse dependence on groundwater for drinking water use, the Draft GSP proposes groundwater levels sustainable management criteria that will likely lead to disparate impacts on protected groups pursuant to state and federal law.	GSP will be modified to include additional descriptions of DACs
131	Leadership Counsel for Justice & Accountability			**The Proposed Undesirable Result for Groundwater Levels is Inadequate** Undesirable results are the point at which "significant and unreasonable" impacts on beneficial users are caused by declining groundwater levels. The SGMA regulations require GSAs to justify their undesirable results by including the " [p]otential effects on the beneficial uses and users of groundwater." As it is currently written, North Kings GSA's undesirable result for groundwater levels will not be triggered until "the water level has declined to a depth that a new productive well cannot be constructed or when the water level has declined to a depth that water quality cannot be treated for beneficial use." This definition implies that it is feasible for beneficial users to continuously install new wells until essentially the bottom of the basin is reached or until the water quality exceeds available treatment technologies, and that any condition short of that does not constitute an undesirable result. This undesirable result does not "consider the interests of" the impact of this policy on disadvantaged communities on domestic wells or shallower community water system wells, who will not be able to drill a new productive well if their wells go dry. Given that there are 8,300 domestic well users in the GSA, and many of those wells and shallow community wells serve households in disadvantaged communities in the GSA area, this policy will disproportionately negatively affect these communities, and will cause disparate impacts under state civil rights law. This policy therefore violates the GSA's obligations under SGMA and state civil rights law. Further, Section 4.2.1.2 of the draft GSP states that the "[w]ater level declining below the minimum threshold in one of the GSA's indicator wells in the monitoring network will be considered significant...with the monitoring network having indicator wells represent large areas, the exceedance of the minimum threshold at just one well location is significant based on how the basin has determined the minimum thresholds...The water level decline to this point would potentially be significant to the stakeholders in the proximity of this indicator well and warrant further evaluation by the NKGSA and potential action." This statement is unclear as it shows a disconnect between the undesirable result for chronic lowering of water levels and the definition of minimum threshold exceedances that trigger action by the North King GSA. Lastly, the GSA dismisses its responsibility for any well going dry by stating that SGMA does not require the GSA to maintain current water levels or prevent any wells from going dry that it only requires the GSA to stabilize and correct groundwater level decline. Additionally, the GSA states that until water levels have been stabilized and the basin has reached sustainability, the GSA will not view a well going dry as an undesirable result. As discussed above, under state law, it is in fact the GSA's responsibility to ensure that it has fully considered whether these impacts to these beneficial user groups are "significant and unreasonable," and that it does not cause a disparate impact on protected groups pursuant to state civil rights law. In order to avoid these disparate impacts and avoid causing significant and unreasonable impacts as required by the SGMA, the GSA must include the following elements in the GSP: • The GSA must describe how it considered the impact of the proposed undesirable result on the domestic wells user and disadvantaged communities in the GSA area. In order to do this, the GSA should conduct a drinking water impact analysis to determine how many wells are at risk of being fully or partially dewatered if the GSA were to come close to reaching or reach the proposed undesirable result. The GSA must make that analysis available to the public in the GSP, and show how all GSA committees	GSP changed in 4.2.2.3 to discuss analysis of the impacts of the water level measurable objectives and minimum thresholds on domestic wells.

				and the GSA board have taken this analysis into account when recommending, creating and evaluating the proposed undesirable result. • The GSP should further clarify the disconnect between the undesirable result for chronic lowering of water levels and the definition of minimum threshold exceedances that trigger action by the North Kings GSA. The North Kings GSA should consider the dewatering of any well that is currently in use, without mitigation measures in place to assist with recovery of safe drinking water resources, to be a significant and unreasonable result.	
132	Leadership Counsel for Justice & Accountability			**Measurable Objectives and Minimum Thresholds** GSAs must set groundwater levels sustainable management criteria that, "if exceeded, may cause undesirable results." Therefore it must have the purpose of avoiding "significant and unreasonable" impacts on beneficial users caused by declining groundwater levels. The GSA must also consider the needs of and impacts to domestic well users and disadvantaged communities, and avoid causing a disparate impact on groups protected under state civil rights law. The GSA has set its measurable objectives and minimum thresholds at drought levels. While drought levels may not be an issue for irrigation and urban water wells who have supplemental surface water supplies to utilize during drought periods, the same is not true of domestic well users. The GSP does not clearly and transparently present the impact of the proposed minimum thresholds/measurable objectives on domestic wells, disadvantaged communities and other key communities within the North Kings GSA area, nor does it present an assessment of how many and which domestic wells are expected to go dry if the minimum thresholds/measurable objectives are reached. Pursuant to 23 CCR § 354.28, assessments of the impacts of proposed minimum thresholds must be included in the GSP in order for the public and DWR to able to fully evaluate the ability of the proposed sustainable management criteria and monitoring program to protect beneficial users within the subbasin. Based on the attached Focus Technical Review of the North Kings Draft GSP, we find that many wells are located outside of a 1.5-mile radius from monitoring wells, and, as the minimum thresholds and measurable objectives are currently proposed, approximately 43% of these domestic wells would be expected to be fully dewatered and an additional 14% of these wells would be expected to be partially dewatered. Many of these wells are likely to be located in communities of color that are low income, and are less likely to be able to address these impacts. No such analysis of drinking water impacts on disadvantaged communities has been done by the GSA. Therefore not only has the GSA not considered these impacts, it has proposed a minimum threshold that will likely cause a disparate impact on communities of color who are protected under state civil rights law. The North Kings GSA must set minimum thresholds and measurable objectives that consider the interests of drinking water beneficial users and do not create a disparate impact on protected groups by doing the following: An impact analysis should be performed in the GSP to accurately evaluate the number of wells that will be impacted should water levels reach the proposed minimum thresholds and measurable objectives and present a thorough and robust analysis, supported by maps, that identifies: (1) which domestic wells are likely to be impacted (including partially dewatered) at the proposed minimum thresholds and measurable objectives and (2) the location of the likely impacted wells with respect to DACs and other communities and systems dependent on groundwater. Consider drinking water impacts in shaping minimum thresholds and measurable objectives, and ensure that disadvantaged communities and domestic well users are protected from disparate and disproportionately negative impact. In order to protect drinking water users, the GSAs should place the minimum threshold at a level above where the shallowest domestic well is screened. Provide a robust drinking water protection program to prevent impacts to drinking water users and mitigate drinking water impacts that occur.	GSP changed in 4.2.2.3 to discuss analysis of the impacts of the water level measurable objectives and minimum thresholds on domestic wells.

133	Leadership Counsel for Justice & Accountability			**The Draft GSP Sustainable Management Criteria for Groundwater Quality are not Adequate** As it is currently written the Draft GSP leaves drinking water users in the subbasin vulnerable to increased drinking water contamination from the GSAs' groundwater management activities or from the lack of adequate groundwater management in the subbasin. The North Kings GSA has not shown how they have considered the interests of beneficial users including domestic well owners and disadvantaged communities in shaping groundwater quality sustainable management criteria.	Thank you for your comments. All comments are given due consideration.
134	Leadership Counsel for Justice & Accountability			**The Draft GSP must protect groundwater quality through groundwater management** SGMA charged GSAs with the responsibility to protect water quality through groundwater management, and requires that the GSA consider the interests of all beneficial users including domestic well users and disadvantaged communities. Additionally, the GSA must also consider that drinking water use has been recognized as the "highest use of water" by the California legislature, and should consult with stakeholders to ensure that the minimum threshold is set is such a way as to guarantee the human right to drinking water to all individuals in the subbasin. The draft GSP fails to incorporate performance measures and management criteria with respect to contaminants that impact human health including those contaminants with established primary drinking water standards, and in so, fails to conform with the requirements of SGMA. The draft leaves drinking water users in the subbasin vulnerable to increased drinking water contamination from the GSAs' groundwater management activities or from the lack of adequate groundwater management in the subbasin. In order to set the minimum threshold, measurable objectives, and undesirable result, that are protective of groundwater quality for all beneficial users in the basin, the GSP must include the following: • All representative monitoring wells must monitor all drinking primary drinking water contaminants. Set a protective minimum threshold, measurable objective, and undesirable result for all constituents with primary drinking water standards that may be impacted by groundwater management activities, or failure to manage groundwater in a way that does not negatively impact groundwater quality.	Thank you for your comments. All comments are given due consideration. GSP will be modified to reflect the GSA plans to ensure WQ monitoring at RMWs will include all COCs at all RMWs in the water quality network.
135	Leadership Counsel for Justice & Accountability			**Undesirable Results** For it's undesirable result, the North Kings GSA states that the "undesirable results determinations will be based on the aggregated effect of: 1) the degradation of water quality to excess of MCLs (i.e. California potable water standards) where concentrations of chemicals of concern have a recent history of being below MCLs; and 2) a statistically significant increase in groundwater degradation where concentrations of chemicals of concern have a recent history of being above MCLs. The occurrence of an undesirable result will be defined as 15% of the representative monitoring wells having reached either of these two criteria for two consecutive years at the same wells". This is an unreasonably lax contamination threshold. By the time 15 percent of representative wells show increases in contamination for two consecutive years, it is more than likely that a high percentage of vulnerable drinking water users will be experiencing severe, long-term drinking water contamination problems before the undesirable result is triggered. The SGMA regulations require GSAs to justify their undesirable results by including the " [p]otential effects on the beneficial uses and users of groundwater." 32 North Kings GSA has included inadequate information or criteria to explain how drinking water will be impacted if this undesirable result is reached, and therefore does not set forth adequate information to justify this decision. In order to set an undesirable result that is protective of groundwater quality for all beneficial users in the basin, the GSP must include the following: • A detailed explanation as to how the groundwater quality undesirable result will result in the protection of groundwater for DACs and other drinking water users in the subbasin • Ensure that this undesirable result does not cause a disparate impact on protected groups under state civil rights law.	GSP changed on page 4-32, to state that actions may be conducted as adverse water quality changes are observed to prevent an undesirable result.
136	Leadership Counsel for Justice & Accountability			**Minimum Thresholds and Measurable Objectives** Per 23 CCR §354.28 and 23 CCR §354.30, GSAs must establish quantitative values for minimum thresholds and measurable objectives for each applicable sustainability indicator at each representative monitoring site. The draft GSP identifies nitrate as NO3, arsenic, dibromo-chloropropane, 1,2,3-TCP, methyl tert-butyl ether, uranium, tetrachloroethylene, trichloroethylene, and hexavalent chromium as chemicals of concern for the North Kings GSA. A multi-scenario methodology for determining minimum thresholds and measurable objectives is described in the draft GSP; however, the draft GSP does not identify which representative monitoring network wells "have a recent history of being above	GSP changed on Table 4-7 to include MCLs and recent data results. Trend lines for each monitoring well will be established and evaluated after each monitoring event to

				MCLs" and which "have a recent history of being below MCLs" (Section 4.4.3.1) and consequently what the actual quantitative water quality minimum thresholds and measurable objectives are. Furthermore, without this information, there is no way of knowing when minimum thresholds and the undesirable result are being triggered. To bring the groundwater quality minimum thresholds and measurable objectives into compliance with SGMA and state civil rights law, the GSP must: • Clearly identify the specific numeric minimum thresholds and measurable objectives for each contaminant of concern at the representative monitoring network wells, and present this information clearly and transparently in tables and maps so that the public and DWR may evaluate the proposed sustainability management criteria. • Clearly state when the minimum thresholds and the measurable objectives are being triggered and concurrent actions to be taken.	ensure early detection of any negative impacts to water quality at the wells in the RMW network.
137	Leadership Counsel for Justice & Accountability			**The GSP Should Ensure No Further Land Subsidence** The GSA has proposed a measurable objective of " annual land subsidence rate at 2.5 in/yr over an area of 36 square miles, with maximum cumulative land subsidence at 0.5ft over 20 years. " 34 The increase in pumping during the recent drought has led to an acceleration in land subsidence. Because the basin is in critical overdraft, the GSA should aim to prevent any subsidence as a result of groundwater management activities, or from failure to manage groundwater in a way that does not aggravate land subsidence. North Kings GSA makes it a point to state several times that land subsidence is not an issue in their area. However, if land subsidence is not an issue, then the North Kings GSA should have no problem setting a more protective measurable objective. To ensure that the GSA sets a more stringent measurable objective, the GSP must do the following: • Establish the measurable objective for land subsidence as zero change in subsidence resulting from groundwater management actions.	Thank you for your comments. All comments are given due consideration.
138	Leadership Counsel for Justice & Accountability			**Projects and Management Actions** The GSA must consider the interests of all beneficial users including domestic well owners and disadvantaged communities and avoid disparate impacts on protected groups. In light of the impacts on domestic well users and disadvantaged communities from the policy decisions discussed above, the GSP must therefore include Projects and Management Actions that protect domestic well users and disadvantaged communities from the drinking water impacts that will occur from the GSA's policy decisions.	Thank you for your comments. All comments are given due consideration.
139	Leadership Counsel for Justice & Accountability			**Projects** The GSA has not shown how it has considered the interests of all beneficial users including domestic well owners, in choosing which projects to adopt and does not show how these projects will benefit protected groups. Projects proposed by the GSA disproportionately benefit agricultural water users over other users. Several of the projects are recharge projects that are for the benefit of agricultural users. Augmenting groundwater and surface water supply is important to diminishing overdraft, but in order to ensure long-term sustainability the GSA must also reduce groundwater demand in the GSA area. Additionally, the draft GSP states that "[e]ach agency within the NKGSA will be responsible for implementing its own projects to reach sustainability." This policy decision is overly burdensome to some agencies in the GSA that are comprised majorly by low income communities, like Biola Community Services District and Del Rey Community Services District, which are dependent on groundwater for their critical drinking water needs, yet may not have the ability to pay for expensive projects and management actions to protect their local drinking water supplies. The following must be incorporated into the Projects section of the GSP in order to avoid a disparate impact on domestic well users in the subbasin: • Include a map of all the proposed projects that have locations. This would allow the public and DWR to identify which areas and communities will benefit from the proposed projects. • Establish a subbasin wide fund for projects to ensure that everyone within the subbasin benefits from proposed projects, particularly communities and households that depend on groundwater for drinking water supplies.	Thank you for your comments. All comments are given due consideration.

				• Include projects that directly and specifically protect drinking water supplies for disadvantaged communities, and ensure that these projects include specific timelines and commitments.	
140	Leadership Counsel for Justice & Accountability			**Management Actions** As per the Draft GSP, the GSA has included a suite of management actions that the board can choose to adopt in order to ensure that the subbasin is sustainable by 2040. While some of the management actions proposed could help protect drinking water needs in the basin, the GSA is not committing to any actions. In order to protect drinking water resources for all beneficial users in the GSA area, and avoid a disparate impact on protected groups, we recommend that the GSA include the following management actions: • Metering: In order to ensure precise measurement of groundwater use and to ensure achievement of the GSA's sustainability goal by 2040, GSAs are prescribed the authority to meter all production wells in the subbasin. North Kings GSA must acknowledge and utilize the authority vested by the state of California to collect relevant groundwater management data and to identify the largest water users. North Kings GSA must reach sustainability therefore metering will be essential to effectively and accurately measuring water use. California Water Code section 10727.4 states that "a groundwater sustainability plan shall include, where appropriate and in collaboration with the appropriate indices" include "efficient water management practices...for the delivery of water and water conservation methods to improve the efficiency of water use." With the data available North Kings GSA and the Kings basin at large will be better equipped to reach sustainability. We recommend that the GSA prioritize subbasin-wide metering on large scale groundwater users. • Drinking Water Warning System: Implementing a warning system so that the North Kings GSA and stakeholders are aware of when wells are going dry, or when wells are going to become contaminated from groundwater management activities, so it can take action to prevent drinking water impacts. If drinking water wells are at risk of impacts, the North Kings should help connect communities and individual homes to nearby reliable water systems. If consolidation is not possible, the North Kings should deepen wells, install treatment facilities or POE/POU treatment in homes. In the interim, the GSA should provide emergency bottled water. • Demand Reduction: The GSA should propose potential programs for requiring and incentivizing demand reduction. Drinking Water Protection Program: If the GSA's policy decisions will lead to drinking water impacts on disadvantaged communities and communities protected from disparate impacts under state civil rights law, including wells going dry and increased drinking water contamination, the GSA must create a fund that will prevent these impacts, or mitigate those impacts should they occur. Such a fund should pay for projects including but not limited to digging deeper wells, replacing wells, connecting communities to a reliable drinking water source, and paying for the increased pumping costs of accessing water at deeper depths. We will gladly speak with you more in detail about how such a program could be structured and financed, and how residents would qualify.	Thank you for your comments. All comments are given due consideration.
141	Leadership Counsel for Justice & Accountability			**The Plan Implementation chapter does not contain adequate information regarding the public process, annual reporting, or the potential to make amendments to the GSP.** The GSA states that it will continue to engage the public during the implementation of the process, but fails to state how it will engage stakeholders in the process. Public engagement has been a critical component to the SGMA implementation process and must continue to be in the GSP implementation process. Additionally, in the annual report outline proposed by the GSA, stakeholder engagement and outreach efforts is not included in any of the key sections. As the Draft GSP is currently written, it is unclear how and when reconsiderations can be proposed. Through its GSP, the GSA must establish processes by which it will seek and incorporate feedback from the public on an ongoing basis through direct outreach to disadvantaged communities and public workshops that are held at convenient locations and times and accessible in multiple languages. Additionally, proposed reconsiderations must be publicly noticed and circulated for public review and comment prior to final adoption. To ensure that the GSP is implemented properly, the GSA must do the following:	GSP Section 2.5.5 changed to include…The GSA will continue to pursue effective methods of communication with stakeholders, including rural domestic pumpers and small farmers, to provide local seasonal and annual groundwater conditions and basic groundwater and well information.

				• The GSA must include a plan for public outreach for the GSP implementation process. This plan should include translation services in order to meaningfully consult with and consider the interest of all beneficial users. Workshops and meetings must be at an accessible time and locations for all stakeholders • The GSA must include public outreach as part of the annual reporting. • The GSA must budget for public outreach. The budget should include translation services in order to meaningfully consult with and consider the interest of all beneficial users. • Clarify in the GSP that the plan may be modified as data becomes available, and that the GSA will seek and accept feedback from the public on an ongoing basis throughout plan implementation. Clarify that any modification to the GSP must be in writing, noticed and provide sufficient time for public review and feedback.	Thank you for your comments. All comments are given due consideration.
142	Leadership Counsel for Justice & Accountability			**The Draft GSP Threatens to Infringe on Water Rights** • In enacting SGMA, the legislature found and declared that "[f]ailure to manage groundwater to prevent long-term overdraft infringes on groundwater rights." The test of SGMA further notes that "[n]othing in this part, or in any groundwater management plan adopted pursuant to this part, determines or alters surface water rights or groundwater rights under common law or any provision of law that determines or grants surface water rights." As discussed in detail above, the Draft GSP allows continued overdraft above the safe yield of the basin, such that drinking water wells (especially domestic wells) will continue to go dry, infringing on the rights of overlying users of groundwater. The GSP must be revised to protect the rights of residents of disadvantaged communities and/or low-income households who hold water rights to groundwater.	Thank you for your comments. All comments are given due consideration.
143	Leadership Counsel for Justice & Accountability			**The Draft GSP Conflicts with the Reasonable And Beneficial Use Doctrine** The "reasonable and beneficial use" doctrine, to which SGMA expressly must comply, is codified in the California Constitution. It requires that "the water resources of the State be put to beneficial use to the fullest extent of which they are capable, and that the waste or unreasonable use or unreasonable method of use of water be prevented, and that the conservation of such waters is to be exercised with a view to the reasonable and beneficial use thereof in the interest of the people and for the public welfare." (Cal Const, Art. X § 2; see also United States v. State Water Resources Control Bd. (1986) 182 Cal.App.3d 82, 105 ["...superimposed on those basic principles defining water rights is the overriding constitutional limitation that the water be used as reasonably required for the beneficial use to be served."].) • The reasonable and beneficial use doctrine applies here given the negative impacts of the Draft GSP on groundwater supply and quality, which are likely to unreasonably interfere with the use of groundwater for drinking water and other domestic uses. As the Draft GSP authorizes waste and unreasonable use, it conflicts with the reasonable and beneficial use doctrine and the California Constitution.	Thank you for your comments. All comments are given due consideration.
144	Leadership Counsel for Justice & Accountability			**The Draft GSP Conflicts with the Public Trust Doctrine** • The "public trust" doctrine applies to the waters of the State, and establishes that "the state, as trustee, has a duty to preserve this trust property from harmful diversions by water rights holders" and that thus "no one has a vested right to use water in a manner harmful to the state's waters." The "public trust" doctrine has recently been applied to groundwater where there is a hydrological connection between the groundwater and a navigable surface water body. In Environmental Law Foundation, the court held that the public trust doctrine applies to "the extraction of groundwater that adversely impacts a navigable waterway" and that the government has an affirmative duty to take the public trust into account in the planning and allocation of water resources. The court also specifically held that SGMA does not supplant the requirements of the common law public trust doctrine. In contrast to these requirements, the Draft GSP does not consider impacts on public trust resources, or attempt to avoid insofar as feasible harm to the public's interest in those resources.	Thank you for your comments. All comments are given due consideration.

Support and Endorsement Policy

Policy No: NKGSA - 001
Policy Title: Support and Endorsement Policy
Board Approval Date:

Purpose

The purpose of this document is to provide direction and to define basic restrictions regarding support of programs and other extrinsic activities, and/or endorsement letters for projects that are located within the North Kings Groundwater Sustainability Agency (NKGSA) boundary or could affect the NKGSA.

Background

The North Kings Groundwater Sustainability Agency covers the northeast portion of the Kings Groundwater Sub-basin in Fresno County. It is one of seven groundwater sustainability agencies within the Kings Sub-basin.

A Joint Powers Agreement (JPA) guides NKGSA governance, and the North Kings Groundwater Sustainability Plan (NKGSP) and its associated publications guide the planning process. Combined, the two documents define numerous objectives and management strategies for providing groundwater sustainability within the NKGSA plan area.

Rationale for Policy

Organizations will often as part of a grant process be required to receive letters of support from the water management agencies in the area of the project. As the agency responsible for groundwater sustainability in the NKGSA boundaries the NKGSA will need to determine whether the organization's program or activities requesting support or endorsement will further the goals of the NKGSP. A process must be identified to evaluate these requests.

Policy

Requests for Endorsement or Agency Participation.

Organizations requesting letters of support from, or the endorsement of, the NKGSA must submit their requests via mail or e-mail to the Executive Officer of the NKGSA. Prior to contacting the Executive Officer, requesting organizations must first self-evaluate how well the project or activity relates to the NKGSA's goals and objectives as outlined by the NKGSP and JPA. Projects and activities that do not sufficiently complement the NKGSA's mission will not receive support.

Requesting organizations are required to provide an Executive Summary or short narrative that at a minimum includes the following information where applicable:

- What is being requested from the NKGSA, (i.e. letter of support, participation, consortium membership, etc.).
- Contact information of the person responsible for the project or activity.

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- Funding source of the proposed project or activity, and the funding amount being requested.
- List of coordinating organizations.
- List of all competing organizations within or in close proximity of the NKGSA boundary.
- Services that are to be offered.
- Target groups to be served, and where the services will be offered.
- Periods or dates of when the proposed project or activity is expected to occur.
- Anticipated outcome(s) of the proposed project or activity.
- The budget for the proposed project or activity.
- If an ongoing or continuation project or activity, description of previous results.

Programs, projects and other activities that show positive responses in the above areas will be eligible to receive NKGSA support. However, the NKGSA reserves the right to supplement, alter, amend, or otherwise change the basic criteria contained in this policy document as it continues to develop its planning process. Copies of signed letters of support will be provided to the NKGSA board.

Appeal Process.

Requests for support which are denied by the Executive Officer in accordance with this Policy may be appealed in writing to the NKGSA Advisory Committee, which will review and provide further direction to the Executive Officer as appropriate or seek a decision from the NKGSA Board of Directors.

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