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State Water Resources Control Board
PO Box 100
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Subject: Flood Reservoir Evaporation – Tulare Lake Subbasin Groundwater Sustainability

The Southwest Kings Groundwater Sustainability Agency [“SWKGSA”] Board of Directors is very concerned over the unreasonable use of the large shallow flood control reservoirs for the storage of groundwater within the El Rico Groundwater Sustainability GSA boundaries. During this unprecedented period of drought, it is urgent that the operation of these shallow flood control reservoirs as holding areas for groundwater be scrutinized as a potential detractor from the beneficial use of groundwater. These reservoirs hold 30,000 or more acre feet of water. Due to evaporation and percolation into the shallow perched highly saline groundwater, they lose approximately 50% pumped into the reservoirs. This volume of water loss is very significant and contributes to undesirable results, particularly subsidence. The intent of the Legislature stated in Water Code 10720.1(e) is *“To avoid or minimize subsidence.”*

The Directors of SWKGSA strongly value local control of groundwater and individual control by private landowners over their operations. Unfortunately, this egregious misuse of groundwater by the J G Boswell Company cannot be overlooked. It is a breach of Article X, Sec. 2, of the California Constitution, *“It is hereby declared that because of the conditions prevailing in this State the general welfare 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.”*

Droughts are likely to increase in severity due to climate change, and the manner by which groundwater and irrigation is managed must change in response. Subsidence in the Tulare Lake Region accelerates with increased groundwater extraction and the use of groundwater must become more efficient to decrease the need for additional demand reduction. Groundwater Sustainability Agencies in neighboring subbasins have begun to monitor and restrict their landowners’ use of this finite resource, while J G Boswell continues to utilize outdated irrigation practices that reduce the likelihood of sustainability.

The SWKGSA Board of Directors firmly believe that irrigation of agriculture and the production of food supply is critical to the future of this state and our country, and we must therefore protect the very water which sustains agriculture. We ask that your agency prohibit the use of large shallow flood reservoirs for groundwater storage, except in flood release years. It is a waste and unreasonable use of a very valuable resource that should be protected to maximize its beneficial use. SWKGSA's Directors would be willing to meet with you to discuss positive solutions for continued regional success.

Sincerely,



Deanna Jackson
Executive Director

Cc: Governor Gavin Newsom
Secretary Wade Crowfoot, California Natural Resources Agency
Paul Gosselin, Deputy Director, Sustainable Groundwater Management
Senator Melissa Hurtado
Assemblyman Rudy Salas
Joe Neves, Chairman, Kings County Board of Supervisors
Catherine Venturella, Clerk of the Board, Kings County Board of Supervisors
Geoff VandenHeuvel, Milk Producers of California
Dennis Mills, Mid-Kings River Groundwater Sustainability Agency
Charlotte Gallock, South Fork Kings Groundwater Sustainability Agency
Jeof Wyrick, El Rico Groundwater Sustainability Agency
Deanna Jackson, Tri-County Water Authority
Lois Henry, SJV Water