



January 3, 2025

Mr. Johnny Gailey  
South Fork Kings GSA  
321 C Street  
Lemoore, CA 93245

**Re: Draft Groundwater Recharge Policy - SFKGS**

Dear Johnny,

Over the past four months, the grower committee has engaged in extensive discussions regarding the Recharge Policy, which will be instrumental in guiding the SFKGS toward long-term sustainability. Given that the Kings River is the sole source of surface water for the GSA area, it is crucial that we maximize flexibility and provide incentives to facilitate water recharge. To this end, I would like to recommend the following revisions to the Recharge Policy:

- Paragraph 6 – Eliminate the 10% annual decrease in carryover credits and replace it with a five-year rolling carryover period.
- Paragraph 7 – For recharge on open ground that will not be farmed, landowners should receive a 75% credit (up from 60%).
- Paragraph 8 – Flood-MAR deliveries on irrigated ground should receive a 75% credit (up from 60%).

Recharge efforts in the SFKGS will face challenges, as illustrated in the attached map. The GSA should investigate the connection between the unconfined A zone and the semi-confined B zone, given that the entire GSA is situated above the A-Clay. Access to both the A and B zones will be essential in keeping agricultural ground in production beyond 2040. Therefore, every means possible should be explored to enhance groundwater levels in these upper zones.

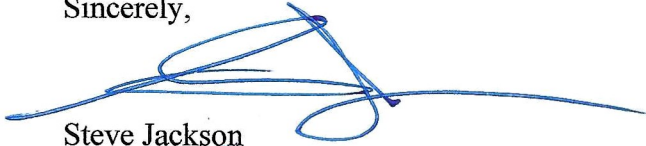
Additionally, it is important to study the potential benefits from recharge on groundwater quality. The Early Action Plan addendum recently released by the Kings Water Alliance highlights a nitrate hotspot north and east of the City of Lemoore. As the State Water Resources Control

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Board staff continues to focus on water quality, it will be necessary for the GSA to evaluate whether targeted recharge in this area could have a positive impact on water quality as well.

I greatly appreciate your efforts in advancing this policy. Please do not hesitate to reach out if you would like to discuss these recommendations further.

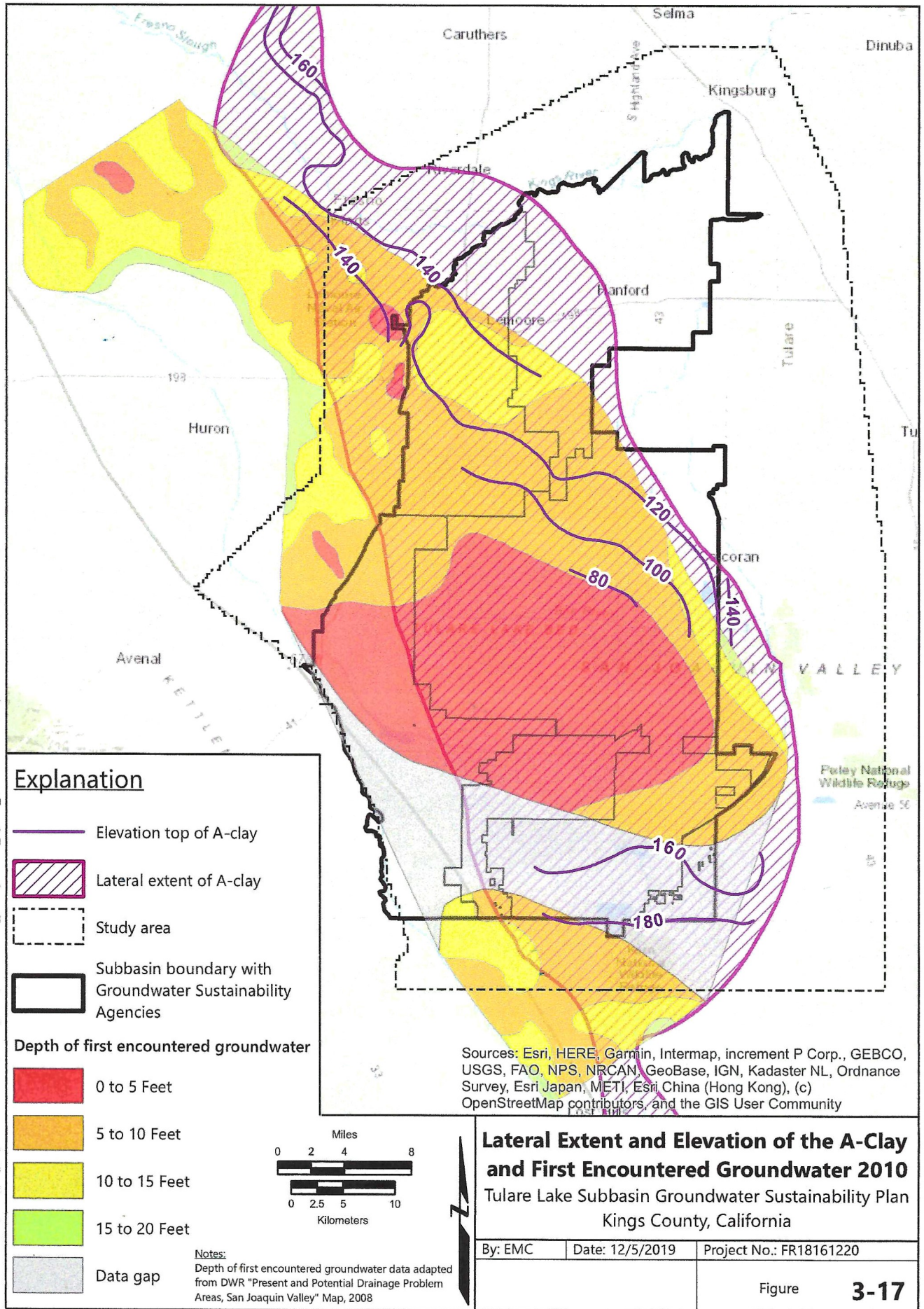
Sincerely,





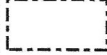

Steve Jackson  
Next Gen Water, Inc.

Cc: Tony Azevedo, Stone Land Co.  
Amer Hussain, Geosyntec Consultants



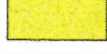
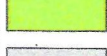
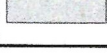
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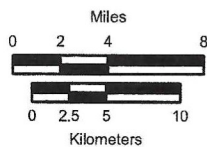


**Explanation**

-  Elevation top of A-clay
-  Lateral extent of A-clay
-  Study area
-  Subbasin boundary with Groundwater Sustainability Agencies

**Depth of first encountered groundwater**

-  0 to 5 Feet
-  5 to 10 Feet
-  10 to 15 Feet
-  15 to 20 Feet
-  Data gap



**Notes:**  
 Depth of first encountered groundwater data adapted from DWR "Present and Potential Drainage Problem Areas, San Joaquin Valley" Map, 2008

Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS User Community

**Lateral Extent and Elevation of the A-Clay and First Encountered Groundwater 2010**

Tulare Lake Subbasin Groundwater Sustainability Plan  
 Kings County, California

By: EMC      Date: 12/5/2019      Project No.: FR18161220

Figure **3-17**