

Lower Tule River Irrigation District GSA Comment Letter Summary Points:

1. Lower Tule is already doing the job locally

- Our GSA is actively managing groundwater and meeting SGMA requirements.
- The plan has been updated multiple times to address State concerns.
- Remaining issues are minor or technical, not a reason for State takeover.

2. We are not overdrafting groundwater

- Lower Tule has a balanced or positive water budget since SGMA was passed.
- We have eliminated all transitional (extra) pumping.
- Total pumping is within our limits each year.

3. We already have strong local rules—and enforce them

- There is a strict demand management program in place.
- Growers who exceed limits or don't pay fees face penalties and enforcement.
- Some properties already have legal enforcement actions recorded.

4. Subsidence is being addressed and improving

- Land sinking (subsidence) is declining significantly.
- Rates have already dropped by about 40% since local actions began.
- New rules target high-risk areas with extra monitoring and restrictions.

5. We protect domestic wells

- Lower Tule has a fully funded well mitigation program.
- No disputes—impacts are being handled responsibly.

6. State intervention will hurt progress

- Extra State reporting, fees, and duplicate rules will:
 - Undermine local progress
 - Punish growers already complying
 - Slow down momentum we've built
 - Local management is more effective and already working.

7. Support those doing the right thing

- Growers who are following the rules should not be treated the same as those who are not.
- If needed, the State could:
 - Focus only on non-compliant pumpers
 - Leave compliant growers under local control

Closing Statement (Optional)

“Lower Tule growers are doing the hard work to meet SGMA. We’ve reduced pumping, enforced rules, and are seeing real results. Please support local management and don’t set us back with unnecessary State intervention.”

Pixley Irrigation District GSA Comment Letter Summary Points:

1. Pixley is being actively managed locally

- Our GSA is actively managing groundwater and meeting SGMA requirements.
- The plan has been updated multiple times to address State concerns.
- Remaining issues are minor or technical, not a reason for State takeover.

2. We are on track to sustainability

- Transitional pumping has already been cut in half for 2026.
- It will be completely eliminated by 2027.

3. Pumping is controlled and decreasing

- Total groundwater use is within overall limits.
- Pumping is trending downward.
- This shows the local program is working.

4. Strong rules are already in place—and enforced

- There is a strict demand management program in place.
- Growers who exceed limits or don’t pay fees face penalties and enforcement.
- Some properties already have legal enforcement actions recorded.

5. Subsidence is being actively addressed

- Land sinking (subsidence) is declining significantly.
- Rates have already dropped by about 40% since local actions began.
- New rules target high-risk areas with extra monitoring and restrictions.

6. Domestic wells are protected

- Pixley has a fully funded mitigation program.
- No disputes—issues are being handled.

7. State intervention will slow progress

- Extra State reporting, fees, and duplicate rules will:
 - Undermine local progress
 - Punish growers already complying
 - Slow down momentum we've built
 - Local management is more effective and already working.

8. Support those doing the right thing

- Growers who are following the rules should not be treated the same as those who are not.
- If needed, the State could:
 - Focus only on non-compliant pumpers
 - Leave compliant growers under local control

Closing Statement (Optional)

“Pixley growers are making real progress. We’ve reduced pumping, strengthened enforcement, and are on track to sustainability. Please support local management and don’t slow us down with unnecessary State intervention.”