EASTERN TULE GROUNDWATER SUSTAINABILITY AGENCY JOINT POWERS AUTHORITY

County of Tulare
City of Porterville
Porterville Irrigation District
Saucelito Irrigation District
Teapot Dome Water District
Vandalia Water District
Terra Bella Irrigation District
Kern-Tulare Water District

Meeting of the ETGSA Stakeholder Committee

Thursday, May 14, 2020
Convenes at 2:00 p.m.

Eric Borba
GSA Chairman

Steve Kisling
GSA Vice-Chairman

Aubrey Mauritson
Legal Counsel

Rogelio Caudillo
General Manager

Zoom Videoconference:
Join Zoom Meeting
https://us02web.zoom.us/j/89161372687
Meeting ID: 891 6137 2687
By Phone:
+1 669 900 9128 US (San Jose)

info@easterntulegsa.com
www.easterntulegsa.com

In accordance with the Governor's Executive Order (N-29-20) and the declared State of Emergency, including social distancing directives as a result of the threat of the COVID-19 virus, committee members and ETGSA staff will be participating in this meeting remotely. There will not be a physical location for this meeting. Members of the public may participate in the meeting in the following ways:

Join Zoom Meeting
https://us02web.zoom.us/j/89161372687

Meeting ID: 891 6137 2687
One tap mobile
+16699009128,,89161372687# US (San Jose)

Dial by your location
+1 669 900 9128 US (San Jose)
Meeting ID: 891 6137 2687
Find your local number: https://us02web.zoom.us/u/kebB5pkM7i

----------AGENDA----------

Action items are listed in **bold.**

1. ROLL CALL

2. PUBLIC COMMENT

At this time, members of the public may comment on any item not appearing on the agenda. Under state law, matters presented under this item cannot be discussed or acted upon by the Committee at this time. For items appearing on the agenda, the public is invited to make comments at the time the item comes up for Committee consideration. Any person addressing the Committee will be limited to a maximum of three (3) minutes or the Chairman's discretion. At all times, please state your name for the record.

3. ANNOUNCEMENTS

4. MINUTES

a. ***ACTION*** **-** Approve the April 9, 2020 Meeting of the ETGSA Stakeholder Committee Minutes.

5. TULE SUBBASIN AND REGIONAL REPORTS AND ITEMS

a. Discussion and potential recommendation on appointment of Member & Alternate to Tule Subbasin Technical Advisory Committee (TAC). (*Stakeholder Committee may make a recommendation to the Board of Directors on appointment of individual to the Tule Subbasin TAC*.)
b. Discussion on Scope of Work and Cost Estimate to Conduct an Analysis of Potential Water Exchanges and Transfers by Thomas Harder.

6. POLICY ISSUES

a. Review & Discussion of ETGSA "Landowner Groundwater Cheat Sheet".
b. Review & Discussion of DRAFT ETGSA Groundwater Banking and Recharge Policy.

7. NEXT MEETING DATE

a. Next Stakeholder Committee Meeting– Thursday, June 11, 2020 at 2pm.

8. ADJOURMENT

A person with a qualifying disability under the Americans with Disabilities Act of 1990 may request the ETGSA to provide a disability-related modification or accommodation in order to participate in any public meeting. Such assistance includes appropriate alternative formats for the agendas and agenda packets used for any public meetings of the GSA. Requests for such assistance and for agendas and agenda packets shall be made in person, by telephone, facsimile, or written correspondence to the General Manager of the ETGSA at (559) 781-7660, at least 48 hours before a public meeting.

EASTERN TULE GROUNDWATER SUSTAINABILITY AGENCY JOINT POWERS AUTHORITY

Agenda Item #4.a

MINUTES OF THE MEETING OF THE STAKEHOLDER COMMITTEE HELD APRIL 9, 2020

At approximately 2:00 p.m. on April 9, 2020, Chairman Bennett called to order a meeting of the Stakeholder Committee of the Eastern Tule Groundwater Sustainability Agency. Consistent with Executive Order N-29-20 and social distancing directives, the meeting was conducted by teleconference only, with no physical location for the meeting.

Stakeholder Members Present:	James Parsons	Bill Bennett
	Matt Watkins	Julie Inestroza
	Jason Guthrie	Sopac Mulholland
	John Konda	Tom O'Sullivan
	Don Castle	
Stakeholder Members Absent:	Kathy Briano	

PUBLIC COMMENT

Chairman Bennett announced the public comment period. No public comment was presented.

ANNOUNCEMENTS

General Manager Rogelio Caudillo announced that DWR has extended the public comment period for ETGSA's GSP to June 3, 2020.

MINUTES

Approve the March 12, 2020 Meeting of the ETGSA Stakeholder Committee Minutes

Committee member Mulholland moved for approval of the minutes of the March 12, 2020 Meeting of the Stakeholder Committee. The motion was seconded by Committee member Konda. The remaining committee members unanimously approved the motion by way of the following roll call vote:

In Favor:
Jason Guthrie
Julie Inestroza
Matt Watkins

TO BE APPROVED

Abstentions:

Don Castle
Tom O'Sullivan

Opposed: None.

TULE SUBBASIN AND REGIONAL REPORTS AND ITEMS

Update on Friant Water Authority Preliminary Financial Impact Analysis of Transitional Groundwater Pumping Technical Memorandum.

Doug DeFlitch provided a report on updates to the Memorandum.

POLICY ISSUES

Discussion Regarding ETGSA Groundwater Financial and Accounting System

Consulting Engineer De Groot provided a presentation on the accounting system for ETGSA. He advised that comments and feedback are welcome.

Discussion ensued regarding the treatment of established plantings.

Consulting Engineer De Groot explained the basis for calculating allocations, and use of allocated water under the prospective accounting system. He also discussed carryover and transferability of allocations.

Discussion ensured regarding carryover and transferability. Concerns were raised regarding a prospective water market. Discussion ensued concerning the relationship between the prospective market and the rules and regulations.

Discussion ensued concerning transferability of allocations.

Public comment received from Garret Busch.

Discussion ensued concerning the characteristics of transitional water allocations. Discussion ensued regarding annual and multi-year allocations.

Trelawney Bullis provided public comment.

Discussion ensued concerning the differences between land that is actively being farmed and land that is not. Discussion ensued concerning lands being farmed and irrigated, but which are not part of the ILRP. Discussion ensued concerning fallowing and allocations for new agricultural production. Discussion ensued concerning potential mechanisms for carrying over allocations. Discussion ensued regarding recharge and groundwater banking policies.

Trelawney Bullis provided public comment.

TO BE APPROVED

Discussion ensued concerning the authority of the districts concerning surface water.

NEXT MEETING DATE

The next Stakeholder Committee Meeting will be on Thursday, May 14, 2020 at 2:00 p.m.

ADJOURNMENT

As there was no further business to come before the Committee, Chairman Bennett adjourned the meeting.

Respectfully submitted,

_____

Chairman Bill Bennett

TO BE APPROVED

ETGSA Stakeholder Committee
May 14, 2020

Agenda Item 5.a

Discussion and potential recommendation on appointment of Member & Alternate to Tule Subbasin Technical Advisory Committee (TAC)

Staff Report to the ETGSA Stakeholder Committee

Subject:	Tule Subbasin Technical Advisory Committee (TAC)
Submitted By:	General Manager
Recommended Action:	*Stakeholder Committee may make a recommendation to the Board of Directors on appointment of individual to the Tule Subbasin TAC.*

Executive Summary:

A Tule Subbasin TAC shall be formed with one (1) representative appointed from each GSA, as well as one (1) alternate from each GSA. The Subbasin TAC shall make technical recommendations regarding the Coordination Agreement and other Tule Subbasin related SGMA compliance issues to each GSA. The Tule Subbasin TAC shall meet, as necessary. Each GSA shall be entitled to one (1) vote. Recommendations to each GSA shall only be made upon consensus of the Tule Subbasin TAC.

Background:

The Tule Subbasin TAC was previously formed under a Memorandum of Agreement executed by all Tule Subbasin GSAs. The Parties agree to the continued existence of the Tule Subbasin TAC pursuant to the terms below. The Tule Subbasin TAC is an advisory committee only and has no authority or power to bind any individual GSA to any recommendation or action item taken by its members.

Fiscal Impact:

n/a

Attachments:

n/a

May 1, 2020

Mr. Eric Limas
Lower Tule River Irrigation District/Pixley Irrigation District
357 E. Olive Avenue
Tipton, California 93272

Re: Proposed Scope of Work and Cost Estimate to Conduct an Analysis of Potential Water Exchanges and Transfers

Dear Mr. Limas,

As per your request, Thomas Harder & Co. (TH&Co) has prepared this proposed scope of work and cost estimate to conduct an analysis of potential water transfers within and between Groundwater Sustainability Agencies (GSAs) within the Tule Subbasin. This scope of work will evaluate the impact of water exchanges between proposed banking projects in the Eastern Tule GSA, the Lower Tule River Irrigation District (LTRID) GSA, and the Pixley Irrigation District (Pixley) GSA. In addition, TH&Co will evaluate potential groundwater exchanges between the LTRID GSA and the Pixley GSA. The purpose of the analysis is to assess the effect of potential water exchange volumes on groundwater level trends and land subsidence at Representative Monitoring Sites (RMS) in the GSAs. A task is also included to identify other potential water exchange or transfer scenarios within the broader Tule Subbasin. Our proposed scope of work is described below.

Scope of Work

Task 1: Prepare Banking Exchange Scenarios

TH&Co will develop model input files to simulate potential banking and exchange scenarios associated with the Tule River-Friant Kern Canal (TR/FKC) Water Bank project and the Deer Creek-FKC (DC/FKC) Water Bank project. There are several potential recharge and recovery scenarios that could be implemented for these projects. The objective of this analysis is to assess potential groundwater level impacts under a plausible range of recharge and recovery scenarios. Preliminarily, the following general recharge/recovery scenarios are proposed:

Scenario	TR/FKC - LTRID		DC/FKC - Pixley		Totals	
	Recharge	Recovery	Recharge	Recovery	Recharge	Recovery
BE-1	750	750	250	250	1,000	1,000
BE-2	3,750	3,750	1,250	1,250	5,000	5,000
BE-3	7,500	7,500	2,500	2,500	10,000	10,000

All values are in acre-ft/yr

For example, under Scenario BE-1, the LTRID GSA will pump 750 acre-ft/yr based on 750 acre-ft/yr to be recharged in the TR/FKC Water Bank project. Simultaneously, the Pixley GSA will pump 250 acre-ft/yr based on 250 acre-ft/yr to be recharged in the DC/FKC Water Bank project. TH&Co will incorporate a 15 percent "leave behind" into each scenario.

The locations of recharge will be the banking facilities identified in GSI Water Solutions (2019).[1] TH&Co will need to work with the LTRID GSA and the Pixley GSA to determine specifically where the extraction will occur. For this analysis, it is assumed that recharge and recovery will occur in the same year (i.e. the volume of water recharged in any given year will be the same as that recovered in the adjacent GSA for that year). As noted earlier, these are preliminary scenarios and Task 1 includes time to finalize the banking scenarios with stakeholder input.

TH&Co proposes to use the version of the Tule Subbasin groundwater flow model (GFM) used to support the Groundwater Sustainability Plans (GSPs).[2] Each simulation will be a forward projection starting after the last calibrated year of the GFM. The assumed hydrology, imported water deliveries, diverted river water deliveries, transitional pumping, and target sustainable consumptive use in the GFM will apply to this analysis.

Task 2: Prepare Groundwater Exchange Scenarios

TH&Co will develop model input files to simulate potential groundwater exchange scenarios for the LTRID and Pixley GSAs. The assumed premise of these scenarios is that the LTRID GSA will exchange a portion of their sustainable groundwater pumping with Pixley GSA. The proposed range of potential groundwater exchanges for simulation using the groundwater flow model are proposed to be as follows:

GE-1. 2,500 acre-ft/yr
GE-2. 5,000 acre-ft/yr
GE-3. 10,000 acre-ft/yr

[1] GSI Water Solutions, 2019. Draft Subsidence Monitoring Program - Tule River - Friant Kern Canal Water Bank and Deer Creek - Friant Kern Canal Water Bank. Prepared for Homer LLC.
[2] TH&Co, 2020. Groundwater Flow Model of the Tule Subbasin. Prepared for the Tule Subbasin Technical Advisory Committee. Dated January 2020.

For example, under GE-1, the LTRID GSA will pump 5,000 acre-ft/yr less than their sustainable pumping whereas the Pixley GSA will pump 5,000 acre-ft/yr more than their sustainable pumping. As noted earlier, these are preliminary scenarios and Task 2 includes time to finalize the exchange scenarios with stakeholder input. Each simulation will be a forward projection starting after the last year of the GFM calibration with the same baseline assumptions as used for Task 1.

Task 3: Analysis of Exchange Scenarios

TH&Co will analyze each of the six scenarios listed in Tasks 1 and 2 using the GFM. Each scenario will be analyzed against a baseline condition without the proposed exchange. The baseline condition will be the future projection from the GFM, which was used for future projections to inform the GSPs for the Tule Subbasin. Upon completion of the analysis, TH&Co will generate the following information:

- Planview groundwater contour maps for each scenario (one map for each of the three TF/FKC-LTRID scenarios and one map for each of the three DC/FKC-Pixley scenarios; a total of six maps) after 5 years of exchange activities for comparison against the baseline condition at the same time.
- Planview maximum groundwater change maps that show the maximum groundwater level changes associated with each exchange scenario (six maps as for the previous bullet item) after 5 years of exchange activity.
- Hydrographs of all RMS wells in the LTRID GSA, Pixley GSA and ETGSA showing change in groundwater elevation over time for each scenario.
- A cumulative land subsidence cross-section along the Friant-Kern Canal after 5 years of exchange activity compared to baseline land subsidence during the same period.

Task 4: Identification of Conceptual Water Exchange Scenarios for the Tule Subbasin

It is likely that other water exchanges or transfers will be desired in the future among the other GSAs in the Tule Subbasin. There are numerous potential combinations of intra-GSA surface water and groundwater exchanges/transfers as well as inter-GSA surface water and groundwater exchanges/transfers. The purpose of this task is to identify and conceptually define plausible exchanges/transfers that could be sought out in the future in the Tule Subbasin. As requested by the Tule Subbasin Technical Advisory Committee, the potential exchange/transfer scenarios can be revised and analyzed using the GFM to assess potential impacts on groundwater levels and land subsidence in the future.

Task 5: Presentation of Results

TH&Co will prepare a MS Powerpoint presentation with the results of the analysis of potential exchanges and transfers outlined in the scope of work described herein. TH&Co will then present the results via a video conference.

Cost Estimate

The estimated cost to complete the above scope of work is $19,380, as summarized in Table 1.

I appreciate the opportunity to provide hydrogeological consulting service for the ETGSA, LTRID GSA and Pixley GSA. If you have any questions regarding this scope of work, don't hesitate to contact me at (714) 394-4449.

Sincerely,

Thomas Harder

Thomas Harder, P.G., C.HG.
Principal Hydrogeologist

Cost Estimate to Prepare an Analysis of Water Exchange Scenarios Between the ETGSA, LTRID GSA, and Pixley GSA

Task	Description	Principal Hydro-Geologist $200/hr	Senior Hydro-Geologist $150/hr	Staff Geoscientist $100/hr	Graphics $85/hr	Clerical $65/hr	Total Labor	Reimbursable Expenses	Total Cost
1	Prepare Three Banking Exchange Scenarios and Input Files	4	16				$3,200		$3,200
2	Prepare Three Exchange Scenarios Between LTRID GSA and Pixley GSA; Includes Preparation of Input Files	4	16				$3,200		$3,200
3	Analysis of Scenarios using the Groundwater Flow Model	6	24	40	8		$9,480		$9,480
4	Identify Additional Conceptual Water Exchange Scenarios for the Tule Subbasin	8	20				$4,600		$4,600
5	Presentation with Draft Results	6	6				$2,100		$2,100
						Total Cost:	**$19,380**	**$0**	**$19,380**

ETGSA GROUNDWATER CHEAT SHEET
DRAFT

Agenda Item #6.a

Buckets of Water	Priority of Use[1]	Transferrable[2]	Definition	Quantities[3]	Extraction Charges	Charge Amount[4]	Invoice Period
1 - Total Precipitation	May be determined by Landowner	Unused amount annually becomes carry over GW Credit	Long-Term Running Average for the GSA, currently 1992 – Present. Value to be updated prior to each water year.	0.87 acre-feet per assessed acre	Based upon ETGSA Annual Budget to operate, administrate, overhead, and ETGSA Specific Projects such as the accounting system. A portion of the overall financial budget is allocated to each Management Area. The Greater Tule Management Area will assess the amount based on the amount of the allocations of water consumed. Assessment is based on the consumed allocated water, if water is unused it will carry over to Bucket 3 and become a credit to privately trade, at which time would be charged the full amount.	$8.68 per acre-foot per year allocated (Based on $1.34M/year Budget)	Monthly
2 – Native Sustainable Yield	May be determined by Landowner	Yes	Defined in Coordination Agreement which includes the natural river channel losses and mountain block recharge. Allocated on assessed acres within the Greater Tule Management Area of the ETGSA.	0.09 acre-feet per assessed acre			
3 - Landowner GW Credits	May be determined by Landowner	Yes	Maintained Separately by each Landowner	Quantity to Vary by Landowner	No ETGSA extraction charges to be charged for Landowner developed groundwater credits.	N/A	N/A
(a) Carry over			Prior year unused Total Precipitation or Native SY				
(b) Purchased			Private Transfers between landowners, requires formal documentation to GSA for record				
4 - Landowner SW Credits	May be determined by Landowner	Yes; Limitations of transfers TBD by Surface Water District	Surface Water Credits, documentation to be provided by Surface Water District for each landowner	Quantity to Vary by Landowner , quantified through the Surface Water District or ETGSA Policy.	No ETGSA extraction charges to be charged for Landowner developed surface water credits.	N/A	N/A
5 - Tier 1 (Transitional)	May be determined by Landowner	Yes	•The Calculated volume of available overdraft water without surface water that is based on the calculated current overdraft in 2019 (112,300 ac-ft/yr) reduced to 90% then 80% then 30% calculated over 5-year periods between 2020 and 2035. •This volume of water is allocated annually to the actively irrigated lands only, based on 2020 records from the ILRP Program, Dairy Program, and/or Land IQ data, or any lands actively irrigated in the future, currently 81,497 irrigated acres. Once lands are included, they remain throughout the duration of the transitional program. If land was actively irrigated prior to 2020 but not during 2020, an application by landowner can be submitted for consideration of transitional water. •Water is allocated annually, initially a 3 - year allocation. Water in the account is capped at the 5-year rolling total.	Total Transitional Volume is 1,123,595 Acre-Feet, available for net irrigated acres, divided 90%-80%-30% as follows: 90%: 2020-2024: 505,618 acre-feet (101,124 ac-ft/yr) - 1.24 ac-ft/ac/yr 80%: 2025-2029: 449,438 acre-feet (89,888 ac-ft/yr) - 1.10 ac-ft/ac/yr 30%: 2030-2034: 168,539 acre-feet (33,708 ac-ft/yr) - 0.41 ac-ft/ac/yr 0%: 2035-2040: 0 acre-feet	Based upon the damages estimated to occur to critical infrastructure from consuming an overdraft of the groundwater supply. Charge will be based on the total estimated damages divided by the total volume of transitional water available and may be adjusted annually by the ETGSA Board.	$200 -$250 per acre-foot consumed (Based on 2020 StanTec Memo)	Monthly
PENALTY FOR OVERUSE							
Tier 2 (Penalty)	Overuse beyond available water in Buckets 1 - 5	No, any amount used deducted from the overall Landowner Tier 1 subsequent annual allocation. Grower may also be physically shut off from pumping if no remaining transitional pumping available	Penalty Water utilized beyond all water buckets available and any remaining Tier 1 5-year block allocation. Any water used in this bucket is reduced from the remaining volume available in Bucket 5: Tier 1 Transitional Water for subsequent 5-year blocks.	Excess of Tier 1. Borrowed from a future annual allocations of available Tier 1 transitional volume. This amount is capped based on the total amount of potential Tier 1 Transitional Water Available.	At a minimum, double the Tier 1 Rate, start at a maximum rate of $500/consumed acre-ft/acre above groundwater extraction fee above. Other Enforcement Actions may also be pursued.	$500 per acre-foot consumed	Monthly

NOTE: Unpaid Extraction Charges may result in potential liens on the land, temporary hold on any future allocations of water, and potential reduction in the subsequent year landowner water allocations.

[1] *Default priority listed above unless landowner manually selects alternative priority. Priority selection must be completed 10 days prior to the monthly invoice period.*

[2] *Transfers of Buckets 1 - 3 currently limited to within the GSA. Future discussions among the Tule Subbasin GSAs may allow transfers outside the GSA.*

[3] *Quantities to be determined by the ETGSA Technical Group*

[4] *The amount identified to be charged are estimated amounts for discussion, not final set values by ETGSA Board for implementation.*

Agenda Item #6.b

SUMMARY OF ETGSA GROUNDWATER BANKING AND RECHARGE POLICY

BACKGROUND

California law permits a party who has a separate legal right to surface water developed from a source that is separate and distinct from the natural or native groundwater supplies existing in a common Basin aquifer to use the developed water for beneficial use. A party that owns a developed water supply "may use the supply by commingling the water with the native supplies and may subsequently recapture the developed water." (*City of Los Angeles v. City of Glendale* (1943) 23 Cal.2d 68, 76-78.) The recapture right includes the amount equivalent to the augmentation contributed by the water stored (either by direct recharge or return flows from water deliveries) (*City of Los Angeles v. City of San Fernando* (1975) 14 Cal.3d 199, 260.) Banking projects are permitted to recharge, store and recover water placed in the Basin aquifer so long as the quantity recovered does not exceed the amount contributed and none of the banking activities cause injury to any Basin resource or the rights of other users of water in the process. If a person entitled to the use of the water fails to use beneficially all or any part of the water for the purpose for which it was appropriated for a period of five years, that unused water shall revert to the public. (*Water Code Section* 1241.)

OBJECTIVES

The objectives in pursuing this groundwater banking and recharge policy on behalf of the ETGSA include the following:

- Improve groundwater conditions;
- Increase water supplies;
- Assist in meeting GSP objectives;
- Provide flexibility to landowners;
- Ensure no negative impacts to overlying owners; and
- *Other?*

POLICY

- Apply to all non-districted lands and districted lands which choose to adhere to ETGSA policy (as opposed to adopting their own).

Groundwater Recharge Accounting

- Landowners may use existing facilities to store surface water underground within the ETGSA boundaries.
- Landowner may subsequently use water for his/her own use or transfer to landowner within ETGSA. Use of water must utilize existing facilities.
- Recharge water must be used within ETGSA boundaries.
- Landowner provides accurate, verifiable records of surface water stored underground for recharge, confirmed by district or entity that supplied the surface water. Must adhere to any rules associated with district or entity supplying the water.
- Water stored must be used within five (5) years.
- Landowner solely responsible for locating, purchasing, accessing, or otherwise acquiring surface water for purposes of recharge.
- Recommendation to add the above to Rules and Regulations.

Groundwater Banking Policy

- Landowners in the ETGSA may desire to construct and operate groundwater banking projects, whereby they obtain access to surface water supplies, cause those surface waters to be placed into the underground through a variety of potential mechanisms, and subsequently transfer those waters to others.
- Any landowner who wants to develop a banking project must complete and submit a written Facilities Report and enter into Written Agreement with ETGSA.
- Facilities Report to include:
    a) The banking site location (Assessor Parcel Number, legal description, and GIS map).
    b) The conveyance and distribution facilities and manner and method of operation.
    c) The recharge facilities and the manner and method of operation.
    d) The recovery facilities (landowner and/or project extraction wells) and the manner and method of operation.
    e) The energy facilities (electric, diesel, solar, etc.).
    f) The schedule for permitting, construction and commencement of operation.
    g) The plan of operation, maintenance, repair and replacement of banking facilities.
    h) The intended source of all banking water supplies (e.g., Central Valley Project, local surface waters, third party exchange/transfer supplies, other).
    i) The banking accounting, measurement, monitoring and reporting procedure.
    j) A Monitoring and Operational Constraint Plan (MOCP) to ensure that unacceptable impacts to neighboring crops, well flow rates, water levels and quality are prevented and/or adequately mitigated.

- Mandatory "Leave Behind" (5% to 15%, depending upon place of use, see Table below).

WATER SUPPLY	PLACE OF USE		
	EASTERN TULE GSA	REMAINDER OF TULE SUB-BASIN	ANY OTHER LEGAL USE
LOCAL SURFACE WATER SUPPLIES[1]	5%	10%	X
IMPORTED SURFACE WATER SUPPLIES[2]	5%	10%	15%

- Landowner responsible for developing procedure for accounting on a monthly and annual basis.
- Water stored must be used within five (5) years.
- Landowner solely responsible for locating, purchasing, accessing, or otherwise acquiring surface water for purposes of banking.
- Maintain separate policy, as details to any potential project unknown. CEQA analysis completed at time project proposed.

[1] "Local surface water supplies" shall include all water derived from local surface tributaries naturally occurring in the Tule Subbasin as follows: flows from Tule River, Deer Creek or White River.

[2] "Imported surface water supplies" shall include all other surface waters other than those defined as "Local Surface Water Supplies" and shall include, but not be limited to, waters from: the Central Valley Project, and neighboring subbasins such as the Kaweah Subbasin.