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Concerns about RRBWSD Draft EIR proposed change of points of diversion

On behalf of the Sierra Club's Kern-Kaweah Chapter and Sequoia ForestKeeper, we are submitting our comments on the Rosedale-Rio Bravo Water Storage District (RRBWSD) Draft Environmental Impact Report (Draft EIR) for the proposed Onyx Ranch South Fork Valley Water Project (proposed project) that is available for review and comment on the RRBWSD website (<http://www.rrbwsd.com>) and the proposed project's website (www.onyxranch.org).

The Draft EIR was prepared to comply with CEQA and the CEQA Guidelines and to provide agencies and the public with information on the potential significant environmental impacts of the proposed project, recommended mitigation measures to reduce or avoid those environmental effects, and the analysis of alternatives to the proposed project. The Public Information Presentation will be available on the RRBWSD website (<http://www.rrbwsd.com>) and the proposed project's website (www.onyxranch.org) no later than June 14, 2020. Written comments on the Draft EIR must be received by the RRBWSD no later than July 27, 2020 at 5:00 P.M.

The Kern-Kaweah Chapter consists of 966 members in Kern County. Sierra Club California, of which the Kern-Kaweah Chapter is an active part, works to protect all California watersheds, especially in the Sacramento-Bay Delta (San Francisco Watershed). The **mission of Sequoia ForestKeeper® (SFK) is to protect and restore the ecosystems of the southern Sierra Nevada through monitoring, enforcement, education, and litigation.** By acting as the eyes, ears, and voice of the forest, SFK seeks to improve land management practices, to promote land stewardship, to enforce existing laws and regulations, to implement public awareness programs, and to offer assistance to local land management agencies. **SFK tracks all living**

things in the Southern Sierra Nevada and Kern County on iNaturalist. View SFK's project in [Kern County](#).

CONCERNS

If the RRBWSD is serious about removing itself from the South Fork Valley with a project that **incorporates project elements and project characteristics that address potential environmental effects on visual aesthetics, air quality, cultural resources, sensitive biological resources and avoid:**

– **Unreasonably affecting fish, wildlife, or other in-stream beneficial uses.**

– **Unreasonably affecting the overall economy or environment** of the South Fork Valley as well as the Kern River Valley, **the RRBWSD Plan must include the following elements:**

(1) address how many residential and community **drinking water wells in the South Fork Kern River Valley could go dry, if the RRBWSD Plan as written were implemented,**

(2) address how many native plant and animal species might be impacted in the South Fork Kern River Valley and San Joaquin Valley due to RRBWSD's removal and transfer of water,

(3) address projections of future precipitation that indicate less water will be available in the west, and address the responsible water claim for RRBWSD to make of **a percentage of the actual flow over future years—instead of an average annual flow over past years,**

(4) restore the South Fork Kern River to a natural meandering river course by removing any and all impediments to a natural meandering stream course, such as concrete slabs, weirs, and hardened streambanks, as well as removing any and all pumps, culverts, conduits, and the like, as well as removing any piping from the greater streambed of the South Fork Kern River,

(5) address the existing greenhouse gas (GHG) emissions from and the environmental effect on air quality and climate and the often claimed beneficial use of removing groundwater from the South Fork Kern River **to provide livestock water**, when the digestive system of livestock create Methane, which is a greenhouse gas that is contributing to the global climate crisis and the droughts, water shortages, and flooding that are more frequently being experienced in California, and

(6) address how providing California water for livestock, which produces climate change and drought, would be considered a beneficial or reasonable use, in light of Article 10, Section 2 of the California Constitution, which declares that “the waste or unreasonable use ... of water be prevented ... The right to water or to the use or flow of water ... does not and shall not extend to the waste or unreasonable use ... of water.”

Despite legislation that appears to enable water transfers to achieve the goals of a particular basin, if the RRBWSD is serious about **meeting its sustainability goals for the RRBWSD groundwater basin in the San Joaquin Valley, would transferring or moving water into the RRBWSD groundwater basin in the San Joaquin Valley from another groundwater basin or the Sacramento Delta really be a sustainable way to manage California's groundwater?**

Would basing a groundwater sustainability plan on the hope of moving a consistent amount of water into the RRBWSD groundwater basin from any other basin be considered dragging

your feet on the necessity of immediately implementing pumping reductions in the RRBWSD basin to prevent further impacts to groundwater?

The Water Foundation (TWF) studied the way groundwater in California is being managed and what would be necessary to not have undesirable results for having water users develop groundwater sustainability plans in their basins. Based on the current trajectory of the Groundwater Sustainability Plans (GSPs) in the San Joaquin Valley the TWF report of June 2020 determined the GSPs could create undesirable results by 2040.

This year marks the start of a new era in California water policy, where state laws and funding recognize and reflect how closely the trajectory of groundwater sustainability and safe drinking water are intertwined. As policymakers and GSAs work diligently to implement SGMA in a manner that supports the state's economy, its communities, and nature, this analysis can conservatively **fill existing data gaps on how unsustainable groundwater practices directly affect drinking water wells.**

GSAs must make policy decisions in GSPs that protect drinking water. As part of the state's review of GSPs, DWR and the Board should ask key questions to help achieve sustainability and avoid undesirable results.

Human right to water: As defined by AB 685, "every human being has the right to safe, clean, affordable, and accessible water adequate for human consumption, cooking, and sanitary purposes."

Groundwater sustainability: As defined by SGMA, "management and use of groundwater in a manner that can be maintained...without causing undesirable results."

Undesirable results: Negative results that GSAs and GSPs are required to avoid under SGMA. There are six undesirable results: groundwater level lowering, reduction of groundwater storage, seawater intrusion, land subsidence, water quality degradation, and depletions of interconnected surface water.

To conduct this analysis for the Water Foundation, consultants at EKI Environment & Water, Inc. used DWR's latest Groundwater Center Interactive Map Application dataset and other publicly available information to understand how implementation of some of the first GSPs in critically over-drafted sub basins in the San Joaquin Valley would affect local drinking water wells. Because DWR's dataset does not include every part of the San Joaquin Valley, this analysis is limited to 26 GSPs in ten critically over-drafted sub basins. Further, one-quarter of the records in the dataset lack basic information about well depths and screening levels, and therefore could not be included in this evaluation.

Considering these data limitations, this analysis provides a conservative baseline assessment of how the estimated water decline predicted in these recently submitted GSPs will impact people who rely on groundwater for their primary water source.

Because this analysis only addresses the ongoing impacts of GSP implementation on drinking water, additional research may be necessary to understand the impacts and costs on other undesirable results, such as land subsidence, impacts to ecosystems, and surface water flows.

Key Findings

- • Between roughly 4,000 and 12,000 drinking water wells will go partially or completely dry by 2040
- • Between roughly 46,000 and 127,000 people will lose some or all of their current water supply by 2040
- • It will cost between \$88 million to \$359 million to restore access to drinking water

While these findings are deeply disturbing, they are not carved in stone. State regulatory agencies can work with these GSAs over the next two years to implement SGMA in a manner that avoids or mitigates these impacts, achieves groundwater sustainability by 2040, and strengthens the right to water for all California residents.

How many individuals in the RRBWSD basin will lose access to clean drinking water from their own wells or from their primary water supply by 2040 because RRBWSD hesitates to immediately implement pumping reductions in the RRBWSD basin? <https://waterfdn.org/wp-content/uploads/2020/06/Groundwater-Management-and-Safe-Drinking-Water-in-the-San-Joaquin-Valley-Brief-6-2020.pdf> What will the cost be to restore access to drinking water for those who lose access?

Would piping water into the RRBWSD groundwater basin be considered hiding groundwater usage in plain sight by moving it through pipes or a river course from outside the area?

The proposed project would result in the use of the surface water moved downstream in the RRBWSD's service area as a beneficial use in Kern County. (Page ES-2)

Has RRBWSD ever sold or traded or exchanged water that was used outside Kern County and could not this water from the South Fork Kern River be ultimately used outside Kern County, thus would not be a beneficial use in Kern County? And given the fact that water used for watering livestock and growing livestock feed crops ultimately end up producing Methane, which is a major climate disruption Greenhouse gas that is causing water shortages, would this use of California's water conflict with the beneficial uses of California's water per Article 10, Section 2 of the California Constitution?

We can support many of the Project Objectives of the RRBWSD, but we have serious concerns about proposing to continue importing water, even in reduced volumes, from the State Water Project (SWP). The SWP is already over allocated and will have declining water resources over time due to declining snowpack as a result of climate change. More importantly, over the past several decades less water has been flowing through the Sacramento Delta and into the

Sacramento Bay because of increased diversions and declining water resources from the Sacramento and San Joaquin Rivers. This has severely impacted California's anadromous fisheries and wetlands in the delta. Additional exports would reduce the amount of water flowing through the Sacramento Delta even more. The numerous harms to the delta environment are documented in a comment letter submitted by Sierra Club California, the Center for Biological Diversity, and other organizations to the Department of Water Resources on April 14, 2020

(http://www.sequoiaforestkeeper.org/pdfs/comment_letters/Water/20200414_FINAL_SCC_Comments_DWR_NOP_EIR_for_Delta.pdf) in response to the Environmental Impact Report for the Delta Conveyance Project. Also, on April 29, 2020, The Sierra Club and other organizations filed a writ of mandate and declaratory and injunctive relief in the Superior Court of The State of California regarding the Delta Conveyance Project, directing the California Department of Water Resources ("DWR") to vacate its approval of the Long-Term Operation of the State Water Project ("SWP" or "Project"), the Findings, and the March 27, 2020 certification of the Final Environmental Impact Report ("EIR") for the Project, and to revise its Findings to conform with the law. (See <https://www.courthousenews.com/wp-content/uploads/2020/04/CalifStateWaterProject-COMPLAINT.pdf>) On May 11, 2020 a district judge ordered the federal government to reinstate stricter pumping limits. In his [36-page order](#), Judge Drozd wrote. "How can these loss limits effectively function to avoid irreparable harm to a declining steelhead population if those loss limits are 'expected to' do no more than 'limit loss to levels similar to what has been observed over the past 10 years?'" (See [https://www.courthousenews.com/wp-content/uploads/2020/05/CalTrout.Order .pdf](https://www.courthousenews.com/wp-content/uploads/2020/05/CalTrout.Order.pdf)) To continue exporting water from already struggling ecosystems and transfer state water to artificially balance water uses and water availability in the RRBWSD basin fails to make the RRBWSD basin self-sustaining and heightens conflicts over water even more. The current water users keep asking for more water, especially the farmers in the San Joaquin Valley and Kern County.

In February 2019, the Public Policy Institute of California published a report titled, "Water and the Future of the San Joaquin Valley", which forecasts the need to fallow or retire approximately 500,000 to 750,000 acres of productive farmland to address the existing groundwater overdraft and water supply deficit in the San Joaquin Valley. (See https://scholar.google.com/scholar_url?url=https://www.ppic.org/wp-content/uploads/water-and-the-future-of-the-san-joaquin-valley-overview.pdf&hl=en&sa=T&oi=gsb-ggp&ct=res&cd=0&d=10590397959608770797&ei=P2PIXvXLKoTzyATpoZKYBg&scisig=AAGBfm3_b1Sv9EXhmnCwyQ5yHY4_JdCdVQ) All the overdrawn aquifers will need much more water from the State Water Project to continue operations *and* recharge the aquifer to achieve sustainability. Unfortunately, there isn't enough state water to bail out all the over drawn aquifers in the state.

Impacts on Climate Change of water use and Water Shortages into the future

Given that water shortages are globally predicted to extend into the foreseeable future unless global changes in energy use and agriculture are quickly altered and research indicates that

using water for growing livestock feed stocks and watering livestock ultimately exacerbate water availability and shortages, in order to quickly recover depleted groundwater in the RRBWSD basin in the San Joaquin Valley, the Grazing Management Plan should include a **drought management strategy** for grazing activities, utilizing more than herd culling but also fallowing of fields in the San Joaquin Valley that produce livestock feed crops, or in the alternative conversion of available water to produce human food products.

Page 1-5 of the DEIR describes the CEQA Environmental Review Process, which indicates at 1.3.1 (3) “prevent significant, avoidable and adverse environmental effects by requiring changes in projects through the use of alternatives or mitigation measures when feasible”.

Shouldn't RRBWSD propose alternatives to recover the groundwater sustainability in its San Joaquin Valley basin to avoid those potential environmental effects and alter its business as usual practices to slow climate change, which is causing more severe droughts?

In light of the ongoing climate crisis, if the RRBWSD wants to comply with the Air Quality Policy 19 Land Use, Open Space, and Conservation Element discussed on page 3.5-20 of the DEIR pursuant to the California Environmental Quality Act, such that, “The benefits of the proposed project outweigh any unavoidable significant adverse effects on air quality found to exist after inclusion of all feasible mitigation” RRBWSD should take into account and consider, for its San Joaquin Valley basin, the fact that the production of alfalfa and other livestock feed crops directly support the cattle industry and dairy industry, which significantly adds to greenhouse gases; methane in particular. The RRBWSD must take dramatic action by only supplying water to entities to reduce greenhouse gas emissions and slow global warming, otherwise “There is a clear longer-term trend toward greater aridification, a trend that only climate action can stop.” (<https://climateneWSnetwork.net/increasingly-arid-future-faces-the-american-west/>) If water uses in the RRBWSD San Joaquin Valley basin include water for Almond orchards, RRBWSD must acknowledge and consider the fact that more than half of the water used to grow Almonds goes to produce the Almond hulls, which are sold as a livestock feed crop used to produce methane-emitting cattle.

The RRBWSD should seriously consider a GSP for its San Joaquin Valley basin that fallows fields, grows different crop types, and retires land to help curtail the climate crisis in an effort to compensate for current overdrafts and future reduced supplies of water for beneficial uses.

If water uses in the RRBWSD San Joaquin Valley basin include water for dairies, RRBWSD should take note that production of cattle-based commodities in large Concentrated Animal Feeding Operations (CAFOs) requires substantial amounts of water. Dr. Craig V. Thomas has documented the daily water usage for a 1000 cow dairy operation in Michigan, and we provide that documentation below for reference:

From **Estimating Water Usage on Michigan Dairy Farms (1,000 head)** Dr. Craig V. Thomas
Michigan State University Extension

<https://co.ashland.wi.us/vertical/sites/%7B215E4EAC-21AA-4D0B-8377-85A847C0D0ED%7D/uploads/WaterUseDeterminationforDairyLarge.pdf>

Tables 5 and 6 show the estimated water usage for hypothetical 1,000 cow dairy farms.

TABLE 5. Estimated total daily water usage for a 1,000 cow dairy farm not recycling milk pre-cooling water (see reference 1).

Usage	Raise Heifers		Do Not Raise Heifers	
	Lower Limit of Total Daily Usage	Upper Limit of Total Daily Usage	Lower Limit of Total Daily Usage	Upper Limit of Total Daily Usage
	Direct	32,750	62,100	22,130
Indirect ^{1,2,3}	19,733	21,826	19,733	21,826
Total	52,483	83,926	41,863	68,826

¹Assumes three time per day milking.

²Based on 80 lbs/cow/d milk production that would require the cleaning of a 6,000 gallon bulk tank 1.5 times per day.

³Assumes 80 lbs/cow/d milk production.

TABLE 6. Estimated total daily water usage for a 1,000 cow dairy farm that recycles milk pre-cooling water (see reference 1).

Usage	Raise Heifers		Do Not Raise Heifers	
	Lower Limit of Total Daily Usage	Upper Limit of Total Daily Usage	Lower Limit of Total Daily Usage	Upper Limit of Total Daily Usage
	Direct	32,750	62,100	22,130
Indirect ^{1,2,3}	3,348	5,440	3,348	5,440
Total	36,098	67,540	25,478	52,440

¹Assumes three time per day milking.

²Based on 80 lbs/cow/d milk production that would require the cleaning of a 6,000 gallon bulk tank 1.5 times per day.

³Assumes 80 lbs/cow/d milk production.

We also note that the production of cattle-associated commodities in large Concentrated Animal Feeding Operations (CAFOs) generates substantial cattle-associated enteric methane [CH₄] emissions, as well as methane emissions associated with anaerobic dairy manure lagoons.

(The enteric methane [CH₄] emissions associated with a typical steer range from 60 to 71 kg per year, according to Johnson and Johnson, 1995. Dairy cows typically emit between 109 and 126 kg of methane per year. [K. A. Johnson and D. E. Johnson, "Methane Emissions from Cattle," *Journal of Animal Science* 73(8) (1995): 2483–92].) [<https://academic.oup.com/jas/article-abstract/73/8/2483/4632901>]

The impact of human water uses and their connection to water scarcity and ecological damage across the United States was assessed in a study (<https://www.nature.com/articles/s41893-020-0483-z>) titled "**Water scarcity and fish imperilment driven by beef production**" published in *Nature Sustainability* by B.D. Richter et. al. (March 2020), which finds irrigation of cattle-feed crops to be the greatest consumer of river water in the western United States. The study "assess opportunities for alleviating water scarcity by reducing cattle-feed production, finding that temporary, rotational fallowing of irrigated feed crops can markedly reduce water shortage risks and improve ecological sustainability."

The use of irrigated water for livestock feed crops that are fed to livestock, which produce climate changing Methane, could be considered both wasteful and unreasonable during this time of drought in California; as such use conflicts with the “waste or unreasonable use” section of the California Constitution. (See Article 10, Section 2, which declares that “the waste or unreasonable use ... of water be prevented ... The right to water or to the use or flow of water ... does not and shall not extend to the waste or unreasonable use ... of water.”) http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=CONS§ionNum=SEC.%202.&article=X

The DEIR says, “**The proposed project would use solar energy, which is a renewable resource, to power the up to 12 new shallow, low-volume wells to provide livestock water.** The water currently consumed in the proposed project area would instead be consumed in RRBWSD’s service area, and as a result, would not result in an overall depletion of water as a nonrenewable resource. Therefore, the proposed project **would not lead to wasteful, inefficient, or unnecessary consumption of energy**, or involve a large commitment of nonrenewable resources, during project construction or operation. (Page ES-14)” But would the proposed project lead to wasteful or unreasonable use of water?

The DEIR says, “With the proposed project, there would be a reduced amount of manure generated by the cattle grazing on the project site. The presence and storage of supplemental feed and the presence of manure on the project site would have the potential for vectors such as flies and rodents to occur. Consistent with the current grazing management practices used on the project site, the proposed project would be implemented in accordance with the South Fork Mosquito Abatement District requirements that address vector control. Therefore, the continued presence of manure and supplemental feed on the project site would not cause an increase in vectors. With implementation of the proposed project, no significant impacts due to vectors would occur as a result of the transition of irrigated fields and pastures to non-irrigated pastures and native vegetation.” (Page 3. 10-28)

The DEIR says, “Methane (CH₄). CH₄ is emitted from biogenic sources (i.e., resulting from the activity of living organisms), incomplete combustion in forest fires, landfills, manure management, and leaks in natural gas pipelines. The GWP of CH₄ is 21 in the IPCC SAR, and 25 in the IPCC AR4.” (Page 3.9-2)

However, in 2014 the Fifth Assessment Report was published using the latest scientific determination, which indicates CH₄ (Methane) is even more impactful to the global climate than previously determined, with a GWP of 28 (see Fifth Assessment Report (AR5)).

Justifying Moving South Fork Kern River Water through Isabella Reservoir to Bakersfield

The DEIR says, “Coordination with the Kern River Watermaster, Kern River Interests, and USACE is required to facilitate the movement of the water through the Isabella Dam, or alternatively,

secure temporary storage of the water in the Isabella Reservoir for later release to the downstream RRBWSD service area.” (Page 3. 11-5)

However, the Kern River Water Master has repeatedly told the public that the water behind Isabella Dam is fully allocated.

The DEIR says, “Failure of the Isabella Reservoir Dam would result in the release of waters to the Lower Kern River, downstream and to the west of the project site. Isabella Dam and Isabella Reservoir were constructed by the USACE in 1954. The primary purpose of the Isabella Dam is flood control. Isabella Reservoir was designed to store approximately 568,000 AF of water; however, due to seepage and earthquake concerns, since 2006 the water storage in the Isabella Reservoir has been limited to approximately 60 percent of capacity or 361,250 AF, which corresponds to a water surface elevation of 2,589 feet (USACE, 2020). As of January 7, 2020, the current storage pool of the Reservoir was 169,461 AF and the water surface elevation was 2,560.3 feet (USACE, 2020).

The USACE is currently constructing the Isabella Lake Dam Safety Modification Project, which addresses potential overtopping and seismic and seepage issues identified with Isabella Reservoir’s main and auxiliary dams to reduce the likelihood of dam failure (USACE, 2019). While the Dam Safety Modification Project is being constructed, USACE has: increased surveillance and monitoring; stockpiled emergency materials; installed warning sirens in the community of Lake Isabella; installed additional instrumentation for monitoring; and conducted continued public outreach with Kern County and the local communities. It is intended that Isabella Reservoir would be restored to the design capacity upon completion of the Dam Safety Modification Project (USACE, 2019).” (Page 3. 11-16)

The DEIR says, “The total water diversions redirected to the South Fork of the Kern River over the 13-year period modeled scenario for the proposed project consisted of 94,442 AF or an average of about 7,265 AF per year. All other pumping for non-project properties within the Hydrological Study Area and recharge stresses in the model remained unchanged from the calibrated model (i.e., no other inputs to existing conditions were changed). The groundwater model assumed that water redirected to the Isabella Reservoir would not be stored on a long-term basis, but released to the Lower Kern River below the Isabella Dam. The groundwater model further assumed that the release of water would not result in a net change in reservoir storage relative to the calibrated existing conditions (no project conditions) over the model period. **In order to determine the volume of surface water available for release downstream without changing the Reservoir storage on a long-term basis, multiple model runs were conducted in which the release volume was adjusted until the change in Reservoir storage for the proposed project was close to the change in Reservoir storage in the calibrated model.** This was done because the Kern River Watermaster controls the volume of water in the Reservoir to maintain water volumes within the range of acceptable Reservoir storage volumes. **Therefore, water levels in the Reservoir would not change with implementation of the proposed project, and the USACE and the Kern River Watermaster would not deviate from the Isabella Reservoir Water Control Manual, unless it is done in coordination and agreement with the Kern River Interests and other legal users.”** (Page 3. 11-28)

The DEIR says, “As discussed above in Section 3.15.1 Environmental Setting, (Surface Water Conditions), surface water in the Hydrological Study Area in the South Fork Valley is used as a source of irrigation water supply for farming and livestock. As discussed in Section 2.6, Water Rights and Proposed Diversion, there are numerous water rights holders for surface water flows along the South Fork of the Kern River. This includes the water rights held by the RRBWSD for the project site. **The proposed project would reduce irrigation on the project site and allow water that is currently diverted under existing conditions to stay in the South Fork of the Kern River and flow downstream into Isabella Reservoir, then the Lower Kern River, and then to the existing RRBWSD diversion structures and recharge basins for storage in their groundwater bank (Thomas Harder & Co., 2019; see Appendix E of this Draft EIR).** No water supply associated with any other Kern River water rights holders would be affected or changed. Therefore, relative to surface water and implementation of the proposed project, there would be no change in surface water supplies available to serve adjacent land uses, communities, and local water suppliers. No impact on surface water supplies would occur. Therefore, relative to surface water, there would be no impact on water supplies available to serve adjacent land uses, communities, and local water suppliers in the South Fork Valley.” (Page 3. 15-12)

Our comment submitted on 23 March 2018 addressed these assertions with the following: **“The Draft EIR must address the Kern River Watermaster, Dana Munn’s statement, ‘Water rights structure does not allow moving water to Bakersfield.’ and ‘Isabella Reservoir is fully allocated.’”** The DEIR fails to directly address the Watermaster’s statements above.

Aqueduct Infrastructure

The conflict over the uses of limited water supplies is only part of the picture. Building an aqueduct across 50 miles of precious desert land is another. If built, the aqueduct would go through *Areas of Critical Environmental Concern* under the Desert Renewable Energy Conservation Plan and the National Conservation Lands Act protecting Mojave Ground Squirrel and Desert Tortoise habitat. Deserts with slow growing plants take decades to recover from ground disturbances.

Please seriously consider our concerns with the Onyx Ranch South Fork Valley Water Project Draft Environmental Impact Report as stated above and do not approve a plan for RRBWSD’s San Joaquin Valley basin that relies on imported water from the South Fork Kern River or the State Water Project. The State Water Project provides a limited source of water and needs to be managed more sustainably. A sustainable, groundwater plan for one basin should not adversely impact the groundwater sustainability of another basin or harm their ecosystems or the ecosystems of the global environment. The whole point to the Groundwater Sustainability Act is for communities to live sustainably within their environment for generations to come.

Sincerely,



Ara Marderosian
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A handwritten signature in black ink, appearing to read "Alison Sheehey". The signature is fluid and cursive, with a large, sweeping flourish at the end.

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