

MSM

A032810

SWRCB - DWR
19 MAY 28 PM 12:07



JOE NEVES
STRATFORD-LEMOORE,
DIST. I

RICHARD VALLE
CORCORAN-AVENAL,
DIST. II

DOUG VERBOON
NORTH HANFORD -
NORTH LEMOORE, DIST. III

CRAIG PEDERSON
HANFORD-ARMONA, DIST. IV

RICHARD FAGUNDES
HANFORD, DIST. V

COUNTY OF KINGS BOARD OF SUPERVISORS

MAILING ADDRESS: KINGS COUNTY GOVERNMENT CENTER, HANFORD, CA 93230
OFFICES AT: 1400 W. LACEY BLVD., ADMINISTRATION BUILDING # 1, HANFORD
(559) 582-2362, FAX: (559) 585-8047
Web Site: <http://www.countyofkings.com>

May 21, 2019

State Water Resources Control Board
Division of Water Rights
Attn: Mitchell Moody
PO Box 2000
Sacramento, CA 95812

RE: Applications A032810 (Consolidated) and A032815 (SemiTropic)

Dear Mr. Moody, Chairman Esquivel, and Honorable Members of the State Water Resources Control Board:

The County of Kings has an ongoing interest in maintaining a local surface water supply from the Kings River and ensuring that it is utilized for the benefit of local communities by license holders who have the rights to divert from the river.

First, the County requests that the State Water Resources Control Board reject the SemiTropic Water Storage District petition to revoke the fully appropriated stream designation on the Kings River. The Kings River was first declared fully appropriated in 1989. The State Board has, reaffirmed this designation in 1991 and 1998. The diverters on the Kings River do their best to manage such an incredibly variable supply and put all water available under their licenses, including floodwater, to beneficial use within the Kings River service area.

The Sustainable Groundwater Management Act makes floodwater even more critical as Districts look for opportunities to capture and store all of the water to which they are entitled under their licenses. The districts within the Kings River service area have been diligent in complying with the state mandate that all groundwater subbasins be brought into sustainability by 2040. This evolving regulatory landscape makes projects that were once only ideas, a practical necessity and a key factor in the success of locally developed groundwater sustainability plans. Increased capacity to capture the highly variable flood flows on the Kings River and use that water either for in-lieu recharge or groundwater banking projects will be imperative to maintain the viability of our communities. The Consolidated application (A032810, attachment 4), demonstrates that there are banking projects that have already been planned and proposed for this supply. These projects will directly benefit the communities within the Kings River service area and ensure that our communities continue to thrive.

Second, the County requests that the State Water Resources Control Board reject the application of the SemiTropic Water Storage District to appropriate floodwater from the Kings River

(A032815). The County has been a staunch opponent of the underlying project since its inception because of the significant local impact it will have on water supply. The County overlies four Bulletin 118 designated, critically overdrafted subbasins and there is a tremendous local need for the floodwater to recharge the subbasins. This application serves an underlying project that will remove any benefit to the underlying subbasin because the water would instead be moved to reservoir in the southwest portion of the county in Kettleman City before it is ultimately pumped out of the Kings River service area for use in Kern County.

The County requests that the State Water Resources Control Board affirm the fully appropriated stream designation on the Kings River once more. Should the State Water Resources Control Board reverse the FAS designation on the Kings River, the County requests that the floodwater remain within the Kings River service area because any uncaptured flood flows will become increasingly important with the implementation of the groundwater sustainability plans that are critical to sustaining both our water supply and communities.

Sincerely,



Joe Neves
Chairman