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May 29, 2019

Alpaugh Irrigation  
District

City of Corcoran

Corcoran Irrigation  
District

County of Kings

Lovelace  
Reclamation District  
No. 739

Melga Water District

Salyer Water District

Tulare Lake Basin  
Water Storage  
District

Tulare Lake  
Drainage District

State Water Resources Control Board Division of Water Rights  
Attn: Mitchell Moody  
P.O. Box 2000  
Sacramento, CA 95812-2000  
[mitchell.moody@waterboards.ca.gov](mailto:mitchell.moody@waterboards.ca.gov)

Dear Chairman Esquivel and Honorable Board Members:

El Rico GSA hereby submits its **opposition** to Semitropic Water Storage District's ("Semitropic") Petition to revoke and/or revise the Kings River Fully Appropriated Stream Declaration. No reasonable cause exists to conduct a hearing on the question whether the fully appropriated status of the stream system should be revoked or revised. As a result, El Rico GSA respectfully requests the Chief, Division of Water Rights, deny a hearing on the matter.

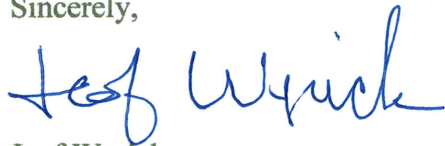
El Rico GSA is a special act district formed for purposes of fulfilling the mandates of the 2014 Sustainable Groundwater Management Act. The El Rico GSA is located within the Tulare Lake Subbasin (5-22.12) pursuant to Bulletin 118, which is ranked as a "high" priority basin by the Department of Water Resources and is a critically overdrafted subbasin. The Kings River is the main source of surface water supply to the El Rico GSA. The Kings River Service Area encompasses three counties, and four subbasins pursuant to Bulletin 118, all of which are critically overdrafted and ranked "high" priority.

Semitropic's Fully Appropriated Stream petition is submitted in an attempt to secure a right to divert Kings River waters for use in Kern County, outside the watershed of origin, to another critically overdrafted subbasin, the Kern County Subbasin (5-22.14). By exporting water from four critically overdrafted groundwater subbasins to a non-hydraulically connected subbasin, the Semitropic project would significantly exacerbate overdraft conditions in the Kings River watershed making it more challenging if not nearly impossible to reach sustainability goals and avoid undesirable results.

Based on Bulletin 118 alone, the demand for all of the waters of the Kings has been objectively proven. Bulletin 118 demonstrates that not enough waters exist in the Kings, Tulare Lake, Kaweah, and Delta-Mendota Subbasins. It is therefore patently false to suggest there are unappropriated waters available on the Kings River. Every ounce of water is needed in the Kings River watershed to ensure sustainability goals are met and to ensure the avoidance of undesirable results.

In conclusion, Semitropic has failed to set forth any facts to show changed circumstances or that reasonable cause exists to hold a hearing on the Kings River FAS Declaration. Based on the status of the subbasins overlying the Kings River Service Area as "high" priority and critically overdrafted, it is clear no unappropriated waters exist. As a result of the foregoing, El Rico GSA respectfully requests the Chief, Division of Water Rights, deny a hearing on the Kings River FAS Declaration.

Sincerely,



Jeof Wyrick  
Chairman, El Rico GSA