



GREATER KAWEAH
GROUNDWATER
SUSTAINABILITY
AGENCY

May 20, 2019

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

Dear Chairman Esquivel and Honorable Board Members:

The Greater Kaweah Groundwater Sustainability Agency (GKGSA) hereby submits its opposition to Semitropic Water Storage District's ("Semitropic") Petition and Alta, Consolidated and Fresno Irrigation District's Petition to revoke and/or revise the Kings River Fully Appropriated Stream Declaration. Based on the critically overdrafted status of the subbasins within the Kings River watershed it is evident no unappropriated waters exist. As a result, GKGSA respectfully requests the Chief, Division of Water Rights, deny a hearing on the matter.

GKGSA is a groundwater sustainability agency formed pursuant to a joint powers authority and is located within the Kaweah Subbasin. Portions of the Kaweah Subbasin (5-22.11) are located within the Kings River Service Area. Several of the GKGSA's member agencies are Kings River water right holders. The Kaweah Subbasin is ranked a "high" priority basin by the Department of Water Resources and is a critically overdrafted subbasin.

Semitropic's FAS 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).¹ By exporting water from the critically overdrafted subbasins which encompass the Kings River Service Area to a non-hydraulically connected subbasin, the Semitropic project would significantly exacerbate overdraft conditions in the Kaweah Subbasin making it more challenging to reach sustainability goals and avoid undesirable results.

GKGSA encourages the State Board not to promote the transfer of resources from critically overdrafted areas in an attempts to alleviate overdraft conditions in neighboring, non-hydraulically connected subbasins. To do so is not an effective or efficient use of water. As a result of the foregoing, GKGSA respectfully requests the Chief, Division of Water Rights, deny a hearing on the Kings River FAS Declaration.

¹ Semitropic's draft EIR also identified its plans to appropriate Kaweah and Tule River waters within the Kaweah and Tule Subbasins for export to the Kern County Subbasin. GKGSA similarly objects to any attempts to appropriate Kaweah River waters out of basin.



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Sincerely,

Eric C. Osterling,
General Manager

Enclosures: None

GK L19-0001
File: GK 101.06.02