

**LONDON COMMUNITY SERVICES DISTRICT**

37835 Kate Road  
Dinuba, CA 93618

May 14, 2019

State Water Resources Control Board Division of Water Rights  
Attn: Mitchell Moody  
P.O. Box 2000  
Sacramento, CA 95812-2000

Dear Chairman Esquivel and Honorable Board Members:

On behalf of the London Community Services District, we write in opposition to Semitropic Water Storage District's (Semitropic) Petition to Revise the Fully Appropriated Stream Status of the Kings River (FAS).

London Community Services District provides water and sewer services within the community of London, which is located in Tulare County. In addition, London Community Services District is a Disadvantaged Community (DAC). California law recognizes the need to address water supply and quality issues for DACs, and it is in this context that London Community Services District submits the following comments on the Semitropic FAS petition.

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. The Kings River is the primary surface water source to the communities within the three counties that comprise the watershed of origin: Fresno, Kings, and Tulare Counties. Groundwater Sustainability Agencies (GSAs) throughout those counties are now engaged in the process of addressing groundwater sustainability, and use of Kings River high water flows is a crucial element of those sustainability efforts.

Public comments submitted on the Semitropic Project establish that historic Kings River flood flows are less than the anticipated groundwater overdraft in Fresno, Kings, and Tulare Counties. We are aware that planning efforts at various levels of regional and local government are underway to fully utilize Kings River high water flows for addressing SGMA impacts and anticipated growth. It only makes sense that Kings River water should be available to meet these needs within the watershed of origin.

The Semitropic Project seeks to divert Kings River high water flows out of the watershed. By exporting water from critically overdrafted groundwater basins, the Semitropic project would significantly impair the ability of the regional GSAs to comply

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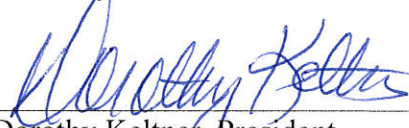
with SGMA without resorting to removing a significant amount of land from production and limiting urban growth. The Semitropic Project would negatively impact the lives and livelihoods of many people in Fresno, Kings, and Tulare Counties who depend on Kings River waters. This is especially true in the community of London, where many of the residents are employed by or on operations supported by the neighboring farms.

California is the first state in the nation to enact a law recognizing that “every human being has the right to safe, clean, affordable and accessible water” – also known as “the human right to water.” The Kings River service area includes 51 “Disadvantaged Communities” – areas which most suffer from a combination of economic, health, and environmental burdens – with a population of 646,236. In addition, the area includes 59 “Severely Disadvantaged Communities” with a population of 84,510. In all, 69 percent of the population that relies upon Kings and Tulare groundwater basins live in a Disadvantaged Community or Severely Disadvantaged Community.

The Semitropic Project has the potential to deprive DACs access to water and jeopardizes long-term regional/local sustainability. DACs already disproportionately suffer from poverty, high unemployment, asthma and heart disease, as well as air and water pollution, and the Semitropic Project will only make already-difficult circumstances worse and threaten “the human right to water.”

For these stated reasons and more, London Community Services District respectfully requests that the State Water Resources Control Board deny Semitropic’s FAS petition. The Semitropic FAS petition and Project are not in the public interest. Instead, the Project would only harm groundwater sustainability efforts, and threaten access to safe, clean, affordable and accessible water.

Sincerely,



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Dorothy Keltner, President  
London Community Services District