

1 DOWNEY BRAND LLP  
2 KEVIN M. O'BRIEN (CA Bar No. 122713)  
3 SAMUEL BIVINS (CA Bar No. 300965)  
4 621 Capitol Mall, 18th Floor  
5 Sacramento, CA 95814-4731  
Telephone: 916.444.1000  
Facsimile: 916.444.2100  
kobrien@downeybrand.com  
sbivins@downeybrand.com

6 Attorneys for Petitioner  
7 SEMITROPIC IMPROVEMENT DISTRICT OF  
SEMITROPIC WATER STORAGE DISTRICT

8 STATE OF CALIFORNIA

9 STATE WATER RESOURCES CONTROL BOARD

10 SEMITROPIC IMPROVEMENT  
11 DISTRICT OF SEMITROPIC WATER  
12 STORAGE DISTRICT,

13 Petitioner,

14 v.

15 KINGS RIVER WATER ASSOCIATION,  
FRESNO IRRIGATION DISTRICT,  
16 CONSOLIDATED IRRIGATION  
DISTRICT, ALTA IRRIGATION  
DISTRICT, and DOES 1 through 100,  
inclusive,

17 Respondents.

18  
19  
**COMPLAINT IN SUPPORT OF PETITION  
TO REVISE AND/OR REVOKE  
DECLARATION OF FULLY  
APPROPRIATED STREAM SYSTEM FOR  
THE KINGS RIVER**

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- 1. Forfeiture of Water Rights**
- 2. Abandonment of Water Rights**
- 3. Failure to Perfect Water Rights**
- 4. Unauthorized Diversion of Water**

20 Petitioner SEMITROPIC IMPROVEMENT DISTRICT OF SEMITROPIC WATER  
21 STORAGE DISTRICT (“Petitioner” or “Semitropic”), for its Complaint against Respondents  
22 KINGS RIVER WATER ASSOCIATION, FRESNO IRRIGATION DISTRICT,  
23 CONSOLIDATED IRRIGATION DISTRICT, ALTA IRRIGATION DISTRICT, and DOES 1  
24 through 100, inclusive (collectively, “Respondents”), hereby alleges as follows:

25 **INTRODUCTION**

26 1. For years, the Kings River Water Association (“KRWA”) and its member units  
27 have purported to hold the water rights to essentially all of the flow of the Kings River. Pursuant  
28 to appropriative water rights License Nos. 11517 – 11522, issued in 1984 by the State Water

1 Resources Control Board (“State Water Board”), KRWA currently holds appropriative water  
2 rights as trustee for the benefit of its member units, including Fresno Irrigation District,  
3 Consolidated Irrigation District, and Alta Irrigation District. KRWA allocates Kings River water  
4 to its member units based on a “settlement schedule” last modified in 1949.

5       2. Water Rights Decision D 1290, issued by the State Water Board in 1967, granted  
6 appropriative water right permits to KRWA’s predecessor based upon its representation that  
7 KRWA and its member units could and would store up to one million acre-feet of Kings River  
8 flood water in a so-called “cellular dike system” maintained in the bed of Tulare Lake. But rather  
9 than exercising the appropriative water right permits authorized under Decision D 1290 as  
10 intended by the State Water Board, Respondents instead have historically diverted substantial  
11 volumes of water out of the Kings River and into the James Bypass, a flood control channel that  
12 conveys water out of the Kings River watershed. The diversion of such substantial volumes  
13 water into the James Bypass is inconsistent with Article X, section 2 of the California  
14 Constitution, the terms of KRWA’s water rights, and the representations made to the State Water  
15 Board by KRWA’s predecessor during the process that resulted in the issuance of Decision D  
16 1290. The unauthorized diversion of Kings River water into the James Bypass has been  
17 undertaken by Respondents because Kings River flows threaten agricultural operations within the  
18 bed of Tulare Lake.

19       3.     Ultimately, only six of the eight permits issued pursuant to D-1290 were converted  
20 to licenses. Appropriative water right License Nos. 11517 and 11521 (the “Tulare Lake  
21 Licenses”) were issued by the State Water Board in 1984. The Tulare Lake Licenses authorize  
22 KRWA to divert, store, and beneficially use Kings River water in the bed of Tulare Lake.  
23 However, as alleged in paragraph 2 of this Complaint, Respondents have failed to put Kings  
24 River water to beneficial use in accordance with the terms and conditions of the Tulare Lake  
25 Licenses. Consequently, Respondents have forfeited, abandoned, and failed to perfect the right to  
26 divert and use Kings River water under the Tulare Lake Licenses.

## **JURISDICTION**

28       4. The State Water Board has jurisdiction over this proceeding under California

1 Water Code sections 1240, 1241, 1675, 1831, and under sections 820, 850, 856, and 871 of Title  
2 23 of the California Code of Regulations.

3 **THE PARTIES**

4 5. Petitioner SEMITROPIC IMPROVEMENT DISTRICT OF SEMITROPIC  
5 WATER STORAGE DISTRICT was formed in 1991 as authorized by the California Water  
6 Storage District Law, Water Code sections 39000 *et seq.*

7 6. Respondent KINGS RIVER WATER ASSOCIATION is an unincorporated  
8 association consisting of 28 member units. KRWA's member units include public irrigation  
9 districts, public water districts, public reclamation districts, a public water storage district and  
10 private water companies. KRWA's offices are located at 4888 E. Jensen Ave, Fresno, CA 93725.  
11 Fresno Irrigation District assigned License Nos. 11517-11522 to the KRWA in 1988, and the  
12 KRWA has acted as the trustee of those Licenses on behalf of its members ever since. The  
13 KRWA manages the diversions and entitlements of its member units under various agreements  
14 and water schedules.

15 7. Respondent FRESNO IRRIGATION DISTRICT ("FID") is a public agency  
16 formed under the California Irrigation District Law (Water Code § 20500 *et seq.*) as the successor  
17 to the privately owned Fresno Canal and Land Company. FID lies entirely within Fresno County,  
18 and its offices are located at 2907 S Maple Ave, Fresno, CA 93725. FID acted as the trustee of  
19 License Nos. 11517-11522 until 1988, and is a member of KRWA.

20 8. Respondent CONSOLIDATED IRRIGATION DISTRICT ("Consolidated") is a  
21 public agency formed under the California Irrigation District Law (Water Code § 20500 *et seq.*).  
22 Consolidated supplies Kings River water to lands in Fresno, Kings, and Tulare Counties, and its  
23 offices are located at 2255 Chandler St, Selma, CA 93662. Consolidated is a member of KRWA.

24 9. Respondent ALTA IRRIGATION DISTRICT ("AID") is a public agency formed  
25 under the California Irrigation District Law (Water Code § 20500 *et seq.*). AID supplies Kings  
26 River water to lands in Fresno, Kings, and Tulare Counties, and its offices are located at 289 N L  
27 St, Dinuba, CA 93618. AID is a member of KRWA.

28 10. Each of the respondents identified as DOES 1 through 100, inclusive ("DOES 1-

1 "100") are persons other than the named respondents who, whether as individuals, corporations,  
2 unincorporated associations partnerships, trustees, executors, guardians, or otherwise, claim some  
3 right, title, estate, lien, or interest in beneficially using Kings River water within the scope of  
4 License Nos. 11517 and 11521 and overlapping pre-1914 appropriative rights. Petitioner is  
5 unaware of the true names and identities of DOES 1-100 and, therefore, sues DOES 1-100 by  
6 fictitious names. Petitioner will amend this pleading to reflect the true identities and capacities of  
7 DOES 1-50 once ascertained.

## **GENERAL ALLEGATIONS**

#### A. Geographical Background

11. The Kings River originates near the crest of the Sierra Nevada, with the  
headwaters of its Middle and South Forks located within Kings Canyon National Park and the  
headwaters of its North Fork located within the John Muir Wilderness. The three forks of the  
Kings River join in the Sierra Nevada foothills in Fresno County, where they are impounded at  
Pine Flat Dam.

12. Pine Flat Dam, constructed by the federal government in 1954, is the largest  
reservoir and principal control structure on the Kings River. Its reservoir holds approximately 1  
million acre-feet (“AF”) of storage and is owned and operated by the United States Army Corps  
of Engineers (“Corps”) for flood control and water supply purposes.

13. Below Pine Flat Dam, the Kings River traverses southwesterly into the San Joaquin Valley, crossing both the Friant-Kern Canal and Highway 99. North of the City of Lemoore, the River splits into two forks. The South Fork drains to the Tulare Lake Bed, which was the historical outlet for the Kings River. The North Fork drains to the James Bypass.

23        14. The hydrology of the Kings River is highly variable. Average annual runoff is  
24 approximately 1.7 million AF, but ranges from 392,000 AF in Water Year (“WY”) 1924 to 4.5  
25 million AF in WY 1983.

26        15. Because one of Pine Flat Dam's functions is to provide flood protection for the  
27 Kings River, Pine Flat Reservoir has defined conservation and flood pools. The reservoir  
28 conservation pool ranges from 0.5 million to 1.0 million AF, depending on the time of year.

1 Once reservoir levels exceed the conservation pool and encroach into the flood pool, the Corps  
2 makes flood releases until the water level in the reservoir is brought back down to the  
3 conservation pool.

4       16. Flood releases from Pine Flat Reservoir are first diverted by KRWA to James  
5 Bypass via the North Fork Kings River. When conditions require flood releases greater than  
6 4,750 cubic feet per second (“CFS”—the approximate capacity of the James Bypass—flows are  
7 also diverted to the former Tulare Lake Bed via the South Fork of the Kings River.

8           **B. Kings River Water Rights**

9       17. KRWA holds the following water rights in trust for its member units: License No.  
10 11517 (Application No. 353/Permit No. 15713), License No. 11518 (Application No. 360/Permit  
11 No. 15714), License No. 11519 (Application No. 5640/Permit No. 15715), License No. 11520  
12 (Application No. 10979/Permit No. 15716), License No. 11521 (Application No. 15231/Permit  
13 No. 15719), and License No. 11522 (Application No. 16469/Permit No. 15720). A map showing  
14 the points of diversion and redirection, and the places of storage under License Nos. 11517 –  
15 11522 is attached hereto as **Exhibit A**. Petitioner is informed and believes and based thereon  
16 alleges that said licenses are inclusive of any pre-1914 rights owned by KRWA’s member units.

17       18. The Tulare Lake Licenses permit KRWA to divert water at Empire Weir # 2 and to  
18 store water within the Tulare Lake Sump Reservoir as described in the licenses. License No.  
19 11517 permits the direct diversion of 613 CFS from June 1 to June 30 of each year, and the  
20 collection to storage of 188,000 AF from January 1 to June 30 of each year. The maximum  
21 amount of water to be taken from the Kings River under License No. 11517 (direct diversion plus  
22 collection to storage) cannot exceed 224,500 AF per year. License No. 11521 allows for the direct  
23 diversion of 1,096 CFS from January 1 to December 31 of each year, and the collection to storage  
24 of 796,000 AF between January 1 and June 30 of each year. The maximum amount of water to  
25 be placed to beneficial use under the Tulare Lake Licenses cannot exceed 569,600 AF per year.

26       19. License No. 11517 has a priority date of May 24, 1916. License No. 11518 has a  
27 priority date of May 31, 1916. License No. 11519 has a priority date of July 30, 1927. License  
28 No. 11520 has a priority date of February 10, 1945. License No. 11521 has a priority date of

1 March 9, 1953. License No. 11522 has a priority date of July 18, 1955.

2        20. On November 30, 1967, the State Water Board issued Decision D 1290 (“D-  
3 1290”) approving eight water right applications for which FID served as trustee, including  
4 Application Nos. 353, 360, 5640, 11023, 11075. D-1290 also approved Application No. 10979 in  
5 part. In approving those applications, the State Water Board found that they would “appropriate  
6 essentially all of the available unappropriated water of the Kings River.” (D-1290 at 37-38.) D-  
7 1290 also determined that all direct diversion and storage allowed under these appropriative water  
8 rights would include all consumptive use claimed under pre-1914 appropriative and riparian  
9 water rights.

10        21. Application Nos. 353 and 15231 were licensed on May 18, 1984. In considering  
11 whether to license Application No. 353 (Permit 15713) and 15231 (Permit No. 15719) for the  
12 storage of water at Tulare Lake, State Water Board staff expressed concern that such storage  
13 never should have been permitted in the first instance, since water stored under those permits was  
14 received on an “involuntary” basis and the Tulare Lake Sump Reservoir had a capacity of only  
15 450,000 AF, compared to a storage right of 984,000 AF under the permits. Contemporaneously,  
16 FID’s engineer also conceded that water is stored in Tulare Lake “unwillingly” and is generally  
17 not put to beneficial use.

18        **C. KRWA’s Management of the Kings River**

19        22. Petitioner is informed and believes and based thereon alleges that water diverted  
20 from the Kings River is governed by a monthly schedule of water rights and entitlements  
21 developed by the KRWA. The documents attached hereto as **Exhibit B** are true and correct  
22 copies of the monthly schedules governing Kings River diversions.

23        23. Kings River water is not diverted to Tulare Lake in years when water is available  
24 to satisfy the Tulare Lake Licenses. Indeed, because License No. 11517 is the highest priority  
25 right held by KRWA, water is always available under that License. But in its Reports of  
26 Licensee from 2012-2016, KRWA did not report using any water under License No. 11517.

27        24. Water was available for storage and use under License No. 11521 in 2011, 2010,  
28 2006, 2005, and 1998. KRWA’s reports of licensee, however, admit that it failed to beneficially

1 use all water available under License No. 11521 in those years. The following sub-paragraphs  
2 detail the specific amount of water available and the amount of water KRWA reported as  
3 beneficially used under License No. 11521:

4 a. In 2011, KRWA had the paper right to divert and store 807,718 AF under  
5 License No. 11521, and to beneficially use 569,000 AF of such water, but reported using only  
6 89,114 AF under that License.

7 b. In 2010, KRWA had the paper right to divert, store, and use 172,172 AF  
8 under License No. 11521, but reported using only 45,376 AF under that License.

9 c. In 2006, KRWA had the paper right to divert and store 713,141 AF under  
10 License No. 11521, and to beneficially use 569,000 AF of such water, but reported using only  
11 147,800 AF under that License.

12 d. In 2005, KRWA had the paper right to divert, store, and use 420,118 AF  
13 under License No. 11521, but did not report using any water under that License.

14 e. In 1998, KRWA had the paper right to divert and store 629,528 AF under  
15 License No. 11521, and to beneficially use 569,000 AF of such water, but only reported using  
16 2,800 AF under that License.

17 25. Plaintiff is informed and believes and based thereon alleges that Kings River flood  
18 releases have been consistently and repeatedly directed by Respondents to areas outside of the  
19 places of use and storage authorized by the Tulare Lake Licenses, in lieu of being stored and  
20 beneficially used within Tulare Lake to prevent flooding of farmland in Tulare Lake. For  
21 example, during years when water was available for diversion and collection to storage under the  
22 Tulare Lake Licenses, Respondents have consistently and repeatedly diverted water from the  
23 Kings River and Pine Flat Reservoir into the James Bypass and to other areas outside the Kings  
24 River Service Area whenever the Corps makes flood releases from Pine Flat Reservoir.  
25 Furthermore, KRWA's member units are parties to a floodwater agreement that expressly  
26 contemplates the diversion and delivery of water to non-members of KRWA located outside the  
27 places of use identified in the Tulare Lake Licenses. Respondents do not hold water rights  
28 authorizing such diversions, nor was the Kings River water diverted to the James Bypass and

1 other areas put to beneficial use by KRWA or any of its members. It is only when flood releases  
2 exceed 4,750 CFS—the approximate capacity of James Bypass—that flood water is allowed by  
3 KRWA to flow to storage in Tulare Lake. Such storage is temporary in character and Semitropic  
4 is informed and believes that, despite representations made in hearings leading to the issuance of  
5 D 1290 that Kings River flood water would be stored and used in a cellular dike system within  
6 the bed of Tulare Lake, Respondents have never done so. Instead, rather than storing water in the  
7 bed of Tulare Lake and beneficially using water within the designated places of use under the  
8 Tulare Lake Licenses, Respondents treat such water as a nuisance and make no beneficial use of  
9 it.

10       26. Respondents divert water to the James Bypass and other unauthorized areas to  
11 avoid delivering water available for diversion, storage, and use under the Tulare Lake Licenses to  
12 prevent flooding of farmland in Tulare Lake. The result of this pattern and practice of  
13 unauthorized diversion by Respondents is that substantial volumes of water are diverted out of the  
14 Kings River and into the James Bypass without any legal basis. Semitropic is informed and  
15 believes, and based thereon alleges, that Respondents caused the following amounts of water to  
16 be diverted from the River to the James Bypass between 1967 and 2017:

- 17           a.     485,000 AF in 1967.
- 18           b.     1,551,000 AF in 1969.
- 19           c.     86,000 AF in 1964.
- 20           d.     551,000 AF in 1978.
- 21           e.     11,800 AF in 1979.
- 22           f.     580,000 AF in 1980.
- 23           g.     453,000 AF in 1982.
- 24           h.     2,309,000 AF in 1983.
- 25           i.     569,000 AF in 1984.
- 26           j.     668,000 AF in 1986.
- 27           k.     587,000 AF in 1995.
- 28           l.     75,000 AF in 1996.

- 1                   m.     437,000 AF in 1997.
- 2                   n.     986,000 AF in 1998.
- 3                   o.     20,000 AF in 1999.
- 4                   p.     63,000 AF in 2005.
- 5                   q.     612,000 AF in 2006.
- 6                   r.     637,000 AF in 2011.
- 7                   s.     709,000 AF in 2017.

8               27. Semitropic is informed and believes, and based thereon alleges, that Respondents  
9     cannot make full use of water available under the Tulare Lake Licenses without either flooding  
10   farmland in the Tulare Lakebed or constructing new facilities for water storage.

11              28. Semitropic is informed and believes, and based thereon alleges, that Respondents  
12   have never intended to construct the water storage facilities necessary to make full use of the  
13   Tulare Lake Licenses.

14              **D. Petitions to Modify the Fully Appropriated Stream Designation for the**  
15              **Kings River**

16              29. In D-1290, the State Water Board determined that the amounts of water applied for  
17     by FID would utilize the entire flow of the Kings River, including flood flows. The State Water  
18     Board further stated that “only in years of exceptionally high runoff would any water be allowed  
19     to leave the Kings River service area through Fresno Slough.” The State Water Board also noted  
20     that outflow through Fresno Slough has occurred in less than one-third of the years since Pine  
21     Flat Dam began storing water. The State Water Board concluded that under these circumstances,  
22     “essentially all of the available unappropriated water of the Kings River” would be appropriated  
23     by its approval of FID’s applications.

24              30. In 1989, the State Water Board declared the Kings River to be a fully appropriated  
25     stream. (*See Order WR 89-25 at 15.*) The State Water Board’s declaration that the Kings River  
26     is a fully appropriated stream (“Kings River FAS Declaration”) was expressly based on State  
27     Water Board staff’s representation that D-1290 determined that the Kings River is fully  
28

1 appropriated year-round. (*See id.*)

2       31. On May 9, 2017, FID, Consolidated, and AID filed a “Petition for Reconsideration  
3 Fully Appropriated Stream Kings River System, Tributary to Tulare Lake Basin” (“FID  
4 Petition”). The FID Petition expressly admits that Respondents and other KRWA member units  
5 “have not historically been able to beneficially use all licensed floodwater.” The FID Petition  
6 was accompanied by Application No. 32810, which seeks to appropriate 1 million AF of Kings  
7 River water annually. True and correct copies of the FID Petition and Application No. 32810 are  
8 attached hereto as **Exhibit C** and **Exhibit D**, respectively.

9       32. The FID Petition fails to satisfy the requirements of the State Water Board’s  
10 regulations governing petitions to revoke or revise a fully appropriated stream declaration. First,  
11 the FID Petition does not seek revocation or revision of the Kings River FAS Declaration, as  
12 required by the Water Code and the State Water Board’s regulations. (*See* Water Code § 1205(c);  
13 Cal. Code Regs., tit. 23, §§ 870-871.) In fact, it does not ask the State Water Board to take *any*  
14 action at this time. Instead, it seeks only to establish the highest priority for Application No.  
15 32810 *in the event* that the Board changes its determination that the Kings River is a fully  
16 appropriated stream. Contingent requests for “reconsideration” are not permitted by the Board’s  
17 regulations governing revocation or revision of fully appropriated stream declarations. Second,  
18 the FID Petition fails to demonstrate reasonable cause to revoke or revise the Kings River FAS  
19 Declaration because FID, AID, and Consolidated expressly contend that the Kings River remains  
20 a fully appropriated stream. (*See* Exhibit C at p. 1; Cal. Code Regs., tit. 23, § 871(b)-(c).)  
21 Accordingly, State Water Board’s Division of Water Rights should reject and dismiss the FID  
22 Petition and Application No. 32810.

23       33. On May 9, 2017, KRWA filed a Petition to Change the Points of Diversion,  
24 Rediversion, Place of Use, Purpose of Use and Distribution of Storage for License No. 11521  
25 (“KRWA Change Petition”). The KRWA Change Petition seeks to substitute License No.  
26 11521’s Tulare Lake bed storage right for storage in Pine Flat Reservoir. It also seeks to vastly  
27 expand the authorized place of use for License No. 11521.

28       34. On May 25, 2017, Semitropic filed a petition to revoke or revise the fully

1 appropriated stream declaration for the Kings River (“FAS Petition”) pursuant to Water Code  
2 section 1205 and section 871 of Title 23 of the California Code of Regulations. In conjunction  
3 with the FAS Petition, Semitropic filed Application No. 32815 to appropriate up to 1.6 million  
4 acre-feet AF of water from the Kings River. A true and correct copy of the FAS Petition and  
5 Application No. 32815 is attached hereto as **Exhibit E**.

### **FIRST CAUSE OF ACTION**

#### **(Forfeiture of Pre- and Post-1914 Appropriative Water Rights – Against All Respondents)**

8       35.      Petitioner incorporates by reference the allegations in paragraphs 1 through 34  
9 above as though fully set forth herein.

10       36.      Semitropic’s FAS Petition, which was filed with the State Water Board on May  
11 25, 2017, constitutes a competing claim for Kings River water covered by License Nos. 11517  
12 and 11521.

13       37.      Water is always available for diversion, use, and collection to storage under  
14 License No. 11517 because it is KRWA’s highest priority right.

15       38.      KRWA and its member units have reported using water under License No. 11517  
16 only in 1985 and 1986. KRWA reported using 16.8 and 29.6 AF of water in 1985 and 1986,  
17 respectively. In all other years, KRWA reported that it used no water under License No. 11517.  
18 Respondents have therefore forfeited their rights under License No. 11517, including any pre-  
19 1914 rights that cover the same diversion, purpose of use, and place of use described in that  
20 license.

21       39.      Since 1984, water has been available to KRWA under License No. 11521 in the  
22 following years: 2011, 2010, 2006, 2005, 1998, 1997, 1996, 1995, 1993, 1986, and 1984.

23       40.      In those years, KRWA reported that it beneficially used a fraction of the water  
24 available under License No. 11521, thereby forfeiting its rights under that license, including any  
25 pre-1914 rights held by Respondents that cover the same diversions, purposes of use, and place of  
26 use described in that license.

27       41.      In every year when the Corps has made flood releases from Pine Flat Reservoir  
28 that could have been collected to storage in Tulare Lake, Respondents have instead diverted water

1 to the James Bypass until the Bypass' capacity was reached. Respondents have therefore  
2 forfeited their rights to store and use Kings River flood flows.

3 **SECOND CAUSE OF ACTION**

4 **(Abandonment of Pre- and Post-1914 Appropriative Water Rights – Against All  
5 Respondents)**

6 42. Petitioner incorporates by reference the allegations in paragraphs 1 through 41  
7 above as though fully set forth herein.

8 43. Respondents never intended to make full beneficial use of Kings River flows  
9 within the scope of the Tulare Lake Licenses. Instead of allowing water to reach Tulare Lake for  
10 storage or beneficial use within the boundaries of the Tulare Lake Basin Water Storage District as  
11 authorized by Licenses 11517 and 11521, Respondents have instead caused Kings River water to  
12 be diverted into unauthorized areas including the James Bypass where it cannot be used within  
13 the place of use described in the Tulare Lake Licenses.

14 44. Water is collected to storage under the Tulare Lake Licenses on an involuntary  
15 basis, only when the James Bypass has reached capacity. Such water is not put to beneficial use,  
16 but instead is treated as a nuisance and evacuated as soon as possible so that agricultural  
17 production in the Lakebed can be resumed.

18 45. At the time the Tulare Lake Licenses were issued or at some time thereafter,  
19 Respondents intended to not utilize or otherwise abandon some, or all, of the rights they received,  
20 including any pre-1914 rights that cover the same diversions, purposes of use, and places of use  
21 described in those licenses. At the time such rights were issued, Semitropic is informed and  
22 believes, and based thereon alleges that the Tulare Lake Sump Reservoir had a capacity of  
23 450,000 AF and that Respondents have never intended to take or have taken any steps to  
24 construct facilities that would permit storage of the full amount of the Tulare Lake Licenses.

25 46. By diverting Kings River flows to the James Bypass and other unauthorized areas,  
26 thereby preventing Kings River flows from reaching Tulare Lake except on an involuntary basis;  
27 by evacuating Kings River flows that do occasionally reach Tulare Lake before they are put to  
28 beneficial use; by failing to construct storage facilities necessary to make full beneficial use of its

1 rights under License Nos. 11517 and 11521; and by failing to make beneficial use of Kings River  
2 water that would have otherwise reached Tulare Lake, Respondents have abandoned their rights  
3 to store and use Kings River water under License Nos. 11517 and 11521, including any pre-1914  
4 water rights held by Respondents that cover the same diversions, purposes of use, and places of  
5 use as described in those licenses.

6 **THIRD CAUSE OF ACTION**

7 **(Failure to Perfect Post-1914 Appropriative Water Rights – Against All Respondents)**

8 47. Petitioner incorporates by reference the allegations in paragraphs 1 through 46  
9 above as though fully set forth herein.

10 48. At the time License Nos. 11517 and 11521 were issued, FID and its agents  
11 admitted to State Water Board staff that Kings River water received in Tulare Lake was not being  
12 put to beneficial use; instead, it was treated as a nuisance and evacuated from Tulare Lake as soon  
13 as possible without being put to beneficial use.

14 49. During the licensing process, State Water Board staff suggested that Permit Nos.  
15 15713 and 15719 should never have been issued because the storage of water in the Tulare  
16 Lakebed was “involuntary” and because such water was not put to a beneficial irrigation use.

17 50. Following the issuance of License Nos. 11517 and 11521, Respondents continued  
18 to regularly divert substantial flows of Kings River water to the James Bypass rather than  
19 allowing such flows to reach the bed of Tulare Lake for beneficial use as anticipated by those  
20 licenses. Indeed, rather than allowing Kings River water to reach the bed of Tulare Lake and be  
21 put to beneficial use, Respondents have consistently diverted Kings River water to the James  
22 Bypass whenever the Corps makes flood releases from Pine Flat Reservoir and involuntarily  
23 allowed Kings River water to flow into Tulare Lake only when the capacity of the James Bypass  
24 was exceeded.

25 51. Accordingly, Respondents failed to perfect the appropriative water rights covered  
26 by License Nos. 11517 and 11521, including any pre-1914 rights that cover the same diversions,  
27 purposes of use, and places of use described in those licenses.

1    **FOURTH CAUSE OF ACTION**

2    **(Unauthorized Diversion of Water – Against All Respondents)**

3       52. Petitioner incorporates by reference the allegations in paragraphs 1 through 51  
4 above as though fully set forth herein.

5       53. Respondents' diversion of water into the James Bypass and other areas is not  
6 authorized by any of KRWA's water right licenses, or any pre-1914 water rights held by KRWA  
7 or its member units that cover the same diversions, purpose of use, and places of use described in  
8 those licenses, and therefore violates Water Code section 1052.

9       54. Respondents' diversion of water into the James Bypass and other areas violates the  
10 terms and conditions of its water rights, including the terms and conditions of any pre-1914 rights  
11 that cover the same diversions, purposes of use, and places of use described in License Nos.  
12 11517 and 11521.

13       55. Semitropic is informed and believes, and based thereon alleges that, unless they  
14 are ordered by the State Water Board to cease and desist from doing so, Respondents intend to  
15 continue to divert Kings River water into the James Bypass and other areas in violation of Water  
16 Code section 1052 and the terms and conditions of License Nos. 11517 and 11521. Semitropic is  
17 informed and believes and based thereon alleges that if Respondents did not divert Kings River  
18 water into the James Bypass and other areas in violation of the terms and conditions of License  
19 Nos. 11517 and 11521, such water would be available for diversion by Semitropic.

20    **PRAYER FOR RELIEF**

21    WHEREFORE, Petitioner respectfully requests that the State Water Board provide the  
22 following relief:

23       1. A declaration and final determination that Respondents have forfeited the water  
24 rights covered by License Nos. 11517 and 11521, and any pre-1914 water rights that cover the  
25 same diversions, purposes of use, and places of use described in those licenses;

26       2. A declaration and final determination that Respondents abandoned the water rights  
27 covered by License Nos. 11517 and 11521, and any pre-1914 water rights that cover the same  
28 diversions, purposes of use, and places of use described in those licenses;

1       3. A declaration and final determination that Respondents failed to perfect the water  
2 rights associated with License Nos. 11517 and 11521, and any pre-1914 water rights that cover  
3 the same diversions, purposes of use, and places of use described in those licenses;

4       4. A declaration and final determination that Respondents' diversions of water into  
5 James Bypass and other areas are not authorized by the California Water Code or KRWA's  
6 Tulare Lake Licenses, and any pre-1914 water rights that cover the same diversions, purposes of  
7 use, and places of use described in those licenses;

8       5. An order that Respondents cease and desist diverting Kings River water into James  
9 Bypass and any other areas not authorized by the Kings River licenses held and administered by  
10 KRWA;

11       6. An order revoking License Nos. 11517 and 11521;

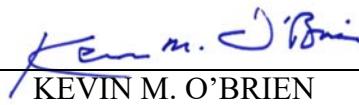
12       7. An order revoking or revising the fully appropriated stream declaration for the  
13 Kings River;

14       8. An order declaring that the water covered by the Tulare Lake Licenses, and any  
15 pre-1914 water rights that cover the same diversions, purposes of use, and places of use described  
16 in those licenses, is available for appropriation by Semitropic under Application No. 32815; and

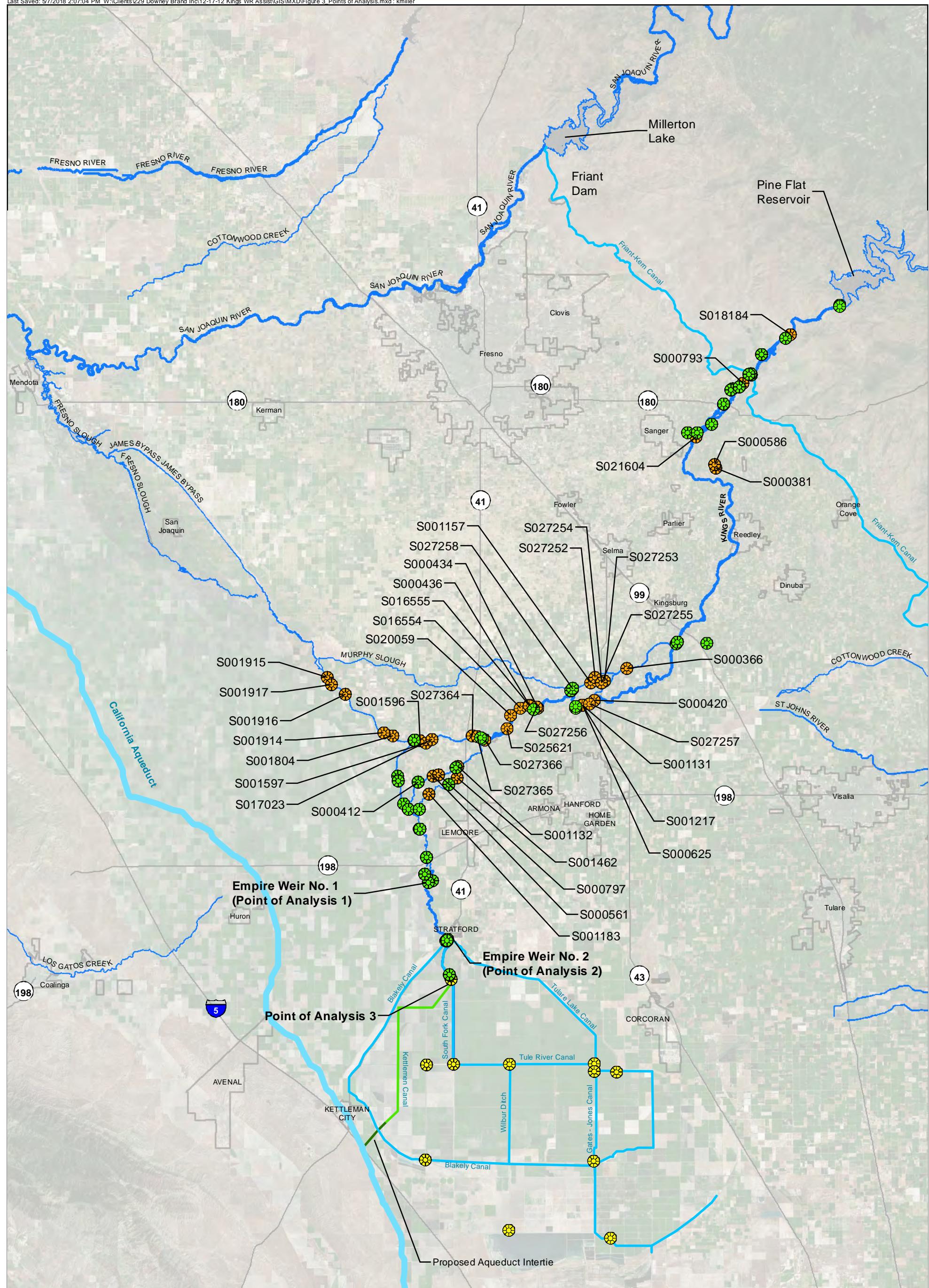
17       9. Such other relief as the Board deems just and proper.

18 DATED: July 2, 2018

DOWNEY BRAND LLP

20 By: \_\_\_\_\_   
21 KEVIN M. O'BRIEN  
22 Attorney for Plaintiff  
23 SEMITROPIC IMPROVEMENT DISTRICT OF  
24 SEMITROPIC WATER STORAGE DISTRICT

# Exhibit A



## Figure 4 Points of Analysis

# Semitropic Improvement District of Semitropic Water Storage District Water Availability Analysis

## Exhibit B

AMERIND KINOS RIVER M. DIVERSION SCHEDULE  
- January -

River at Piedra	Main River and North Fork	Laguna Distr.	Murphy Slough Assn.	Fresno Dist.	Lencore Canal	People's Canal	Last Chance Canal	Consolidated Canal	Alta Canal	Liberty Canal	Crescent Canal	Stinson Canal	Burrell Ranch	Jones Main Canal	Beta Main Canal	Lake-lands Canal	South Fork	Clark's Fork	Upper South Fork	Reinlen Canal	Empire No. 1	Empire No. 2	Lovelace	Water at Estates W. No. 2
100	100	18	15	100	70	65	85																	
200	200	15	15	100	70	65	85																	
300	300	15	15	100	70	65	85																	
400	400	15	15	100	70	65	85																	
450	450	15	15	100	70	65	85																	
500	500	15	15	100	70	65	85																	
600	600	15	15	100	70	65	85																	
700	700	15	15	100	70	65	85																	
800	800	15	15	100	70	65	85																	
900	900	15	15	100	70	65	85																	
1000	1000	15	15	100	70	65	85																	
1100	1100	15	15	100	70	65	85																	
1200	1200	15	15	100	70	65	85																	
1300	1300	103	102	300	360	235	150																	
1400	1400	103	102	300	360	235	150																	
1500	1500	135	500	871	856	155																		
1600	1600	135	500	871	856	155																		
1700	1700	159	169	312	385	266	161																	
1800	1800	177	169	315	365	275	165	26	7	64	109	102												
1890	1890	194	184	305	380	280	169	49	14	55	115	102												
1900	1900	194	184	305	380	280	169	51	15	55	115	102												
1950	1950	210	210	320	385	284	181	52	15	55	115	102												
2100	2100	215	186	322	385	283	174	80	23	57	113	102												
2200	2200	227	194	324	385	292	176	96	27	68	127	102												
2300	2300	238	199	326	386	294	177	111	32	59	125	102												
2400	2400	239	199	326	386	294	177	111	32	59	125	102												
2500	2500	235	194	326	385	294	178	111	32	59	125	102												
2600	2600	215	186	322	385	283	174	80	23	57	113	102												
2700	2700	217	186	322	385	283	174	80	23	57	113	102												
2800	2800	217	186	322	385	283	174	80	23	57	113	102												
2900	2900	217	186	322	385	283	174	80	23	57	113	102												
3000	3000	217	186	322	385	283	174	80	23	57	113	102												
3100	3100	217	186	322	385	283	174	80	23	57	113	102												
3200	3200	217	186	322	385	283	174	80	23	57	113	102												
3300	3300	217	186	322	385	283	174	80	23	57	113	102												
3400	3400	217	186	322	385	283	174	80	23	57	113	102												
3500	3500	217	186	322	385	283	174	80	23	57	113	102												
3600	3600	310	292	359	385	361	220	307	104	76	165	102												
3700	3700	302	304	358	385	361	224	309	111	76	165	102												
3800	3800	311	266	358	385	361	224	309	111	76	165	102												
3900	3900	311	272	358	385	361	224	309	111	76	165	102												
4000	4000	311	272	358	385	361	224	309	111	76	165	102												
4100	4100	311	272	358	385	361	224	309	111	76	165	102												
4200	4200	311	272	358	385	361	224	309	111	76	165	102												
4300	4300	311	272	358	385	361	224	309	111	76	165	102												
4400	4400	311	272	358	385	361	224	309	111	76	165	102												
4500	4500	311	272	358	385	361	224	309	111	76	165	102												
4600	4600	311	272	358	385	361	224	309	111	76	165	102												
4700	4700	311	272	358	385	361	224	309	111	76	165	102												
4800	4800	311	272	358	385	361	224	309	111	76	165	102												
4900	4900	311	272	358	385	361	224	309	111	76	165	102												
5000	5000	311	272	358	385	361	224	309	111	76	165	102												
5100	5100	311	272	358	385	361	224	309	111	76	165	102												
5200	5200	311	272	358	385	361	224	309	111	76	165	102												
5300	5300	311	272	358	385	361	224	309	111	76	165	102												
5400	5400	311	272	358	385	361	224	309	111	76	165	102												
5500	5500	311	272	358	385	361	224	309	111	76	165	102												
5600	5600	311	272	358	385	361	224	309	111	76	165	102												
5700	5700	311	272	358	385	361	224	309	111	76	165	102												
5800	5800	311	272	358	385	361	224	309	111	76	165	102												
5900	5900	311	272	358	385	361	224	309	111	76	165	102												
6000	6000	311	272	358	385	361	224	309	111	76	165	102												
6100	6100	311	272	358	385	361	224	309	111	76	165	102												
6200	6200	311	272	358	385	361	224	309	111	76	165	102												
6300	6300	311	272	358	385	361	224	309	111	76	165	102												
6400	6400	311	272	358	385	361	224	309	111	76	165	102												
6500	6500	311	272	358	385	361	224	309	111	76	165	102												
6600	6600	311	272	358	385	361	224	309	111	76	165	102												
6700	6700	311	272	358	385	361	224	309	111	76	165	102												
6800	6800	311	272	358	385	361	224	309	111	76	165	102												
6900	6900	311	272	358	385	361	224	309	111	76	165	102												
7000	7000	311	272	358	385	361	224	309	111	76	165	102												
7100	7100	311	272	358	385	361	224	309	111	76	165	102		</										

AMENDED KINGS RIVER MON.—DIVERSION SCHEDULE  
—February —

River at Piedra	Main River and North Fork	Laguna Dist.	Murphy Slough Attn.	Presso Dist.	Lamore Canal	Peoples Canal	Last Chance Canal	Consol- idated Canal	Alta Canal	Liberty Canal	Crescent Canal	Stinson Canal	Burrel Ranch	James Main Canal	Bata Main Canal	Lake- lands Canal	South Fork	Clark's Fork	Upper San Joaquin Canal	Reinlen Canal	Empire No. 1	Empire No. 2	Lower Lanes	Water at Empire No. 2	River at Piedra
100	100	15	15	70																					160
200	200	15	15	100																					200
300	300	15	15	150																					300
400	400	15	15	100																					400
450	450	15	15	100																					450
500	500	15	15	150																					500
600	600	15	15	250																					600
700	700	15	15	300																					700
600	800	15	15	400																					800
900	900	15	15	600																					900
1000	1000	15	15	550																					1000
1100	1100	15	15	600																					1100
1200	1200	15	15	600																					1200
1300	1300	20	20	500																					1300
1400	1400	20	20	500																					1400
1500	1500	25	25	500																					1500
1600	1600	65	65	500																					1600
1700	1700	65	65	500																					1700
1800	1800	65	65	500																					1800
1900	1900	65	65	500																					1900
2000	2000	65	65	500																					2000
2100	2100	66	68	505	375	285	175	202	202	60	101	101													2100
2200	2200	75	915	578	866	245	165	100	80	60	101	101													2200
2300	2300	77	924	579	871	247	167	111	80	60	101	101													2300
2400	2400	80	97	531	281	191	295	224	81	107	101	101													2400
2500	2410	92	537	362	815	216	250	51	109	101	101	101	1	22	90	50	50	10	10	25	5		2500		
2600	2470	65	97	543	385	296	159	240	235	51	110	101	1	1	27	130	50	50	50	50	50	50		2600	
2700	2530	104	105	505	395	298	151	245	240	51	111	101	1	1	31	170	50	50	50	50	50	50		2700	
2800	2690	91	106	555	386	309	207	365	246	52	114	101	1	1	35	210	50	50	50	50	50	50		2800	
2900	2650	94	111	561	387	316	211	408	251	52	115	101	1	1	2	250	50	50	50	50	50	50		2900	
3000	2700	88	97	568	389	316	216	434	258	52	117	101	1	1	2	250	50	50	50	50	50	50		3000	
3100	2710	103	112	570	390	331	218	436	260	52	118	101	1	1	2	250	50	50	50	50	50	50		3100	
3200	2860	105	137	565	392	335	225	456	271	53	121	101	1	1	2	250	50	50	50	50	50	50		3200	
3300	2930	108	134	569	393	346	230	515	277	53	123	101	1	1	2	250	50	50	50	50	50	50		3300	
3400	3000	111	134	595	395	346	235	559	284	53	125	101	1	1	2	250	50	50	50	50	50	50		3400	
3500	3070	114	134	595	395	350	240	559	286	53	126	101	1	1	2	250	50	50	50	50	50	50		3500	
3600	3140	118	149	613	398	370	245	561	295	53	128	101	1	1	2	250	50	50	50	50	50	50		3600	
3700	3110	122	154	618	399	377	249	517	303	53	130	101	1	1	2	250	50	50	50	50	50	50		3700	
3800	3250	126	160	625	402	380	254	564	309	54	132	101	1	1	2	250	50	50	50	50	50	50		3800	
3900	3350	128	164	625	402	393	259	670	316	54	134	101	1	1	2	250	50	50	50	50	50	50		3900	
4000	3410	130	164	625	404	399	252	652	316	54	135	101	1	1	2	250	50	50	50	50	50	50		4000	
4100	3470	134	170	644	405	408	267	715	326	55	138	101	1	1	2	250	50	50	50	50	50	50		4100	
4200	3530	137	180	650	406	413	271	737	332	55	139	101	1	1	2	250	50	50	50	50	50	50		4200	
4300	3590	137	184	654	407	413	276	700	337	55	139	101	1	1	2	250	50	50	50	50	50	50		4300	
4400	3650	143	184	656	408	416	278	745	341	55	140	101	1	1	2	250	50	50	50	50	50	50		4400	
4500	3710	146	194	669	410	422	284	700	345	55	144	101	1	1	2	250	50	50	50	50	50	50		4500	
4600	3770	149	199	675	411	429	288	627	355	55	145	101	1	1	2	250	50	50	50	50	50	50		4600	
4700	3830	152	203	681	412	435	294	650	355	55	147	101	1	1	2	250	50	50	50	50	50	50		4700	
4800	3890	152	207	681	412	437	298	652	358	55	148	101	1	1	2	250	50	50	50	50	50	50		4800	
4900	3950	157	213	693	415	439	298	685	359	55	150	101	1	1	2	250	50	50	50	50	50	50		4900	
5000	4000	160	216	698	416	440	300	688	361	55	152	101	1	1	2	250	50	50	50	50	50	50		5000	
5100	4060	168	220	703	418	470	307	935	379	55	152	101	1	1	2	250	50	50	50	50	50	50		5100	
5200	4120	172	220	703	418	470	307	935	379	55	152	101	1	1	2	250	50	50	50	50	50	50		5200	
5300	4180	177	224	734	423	507	322	1045	406	55	161	101	1	1	2	250	50	50	50	50	50	50		5300	
5400	4240	177	224	734	423	507	322	1045	406	55	161	101	1	1	2	250	50	50	50	50	50	50		5400	
5500	4300	179	245	739	424	511	322	1045	406	55	161	101	1	1	2	250	50	50	50	50	50	50		5500	
5600	4360	182	245	739	424	511	322	1045	406	55	161	101	1	1	2	250	50	50	50	50	50	50		5600	
5700	4420	187	245	739	424	511	322	1045	406	55	161	101	1	1	2	250	50	50	50	50	50	50		5700	
5800	4480	192	245	739	424	511	322	1045	406	55	161	101	1	1	2	250	50	50	50	50	50	50		5800	
5900	4540	196	245	739	424	511	322	1045	406	55	161	101	1	1	2	250	50	50	50	50	50	50		5900	
6000	4600	201	247	747	425	515	322	1045	406	55	161	101	1	1	2	250	50	50	50	50	50	50		6000	
6100	4660	201	247	747	425	515	322	1045	406	55	161	101	1	1	2	250	50	50	50	50	50	50		6100	

**AMERICAN KINGS RIVER.      BY DIVISION SCHEDULE**

- March -

all of  
the in-  
crease

AMENDED KINGS RIVER MO. DIVERSION SCHEDULE  
- April -

Note: For flows above 15,625 cubic feet per second at Piedra, the excess is to be divided one-half to the Main River and North Fork and one-half to the South Fork.

all of  
the in-  
creases

AMENDED KINGS RIVER MONITOR DIVERSION SCHEDULE

- May - Last Consol

17000

Note: For flows above 17,000 cubic feet per second, the allocation is one-half to the Main River and North Fork and one-half to the South Fork.

All of  
the in-  
crease

**AMENDED KING RIVER MONTHLY DIVERSION SCHEDULE**

- June -

River at Piedra	Main River at North Fork	Laguna Dist.	Murphy Slosh Assn.	Presno Dist.	Lenore Canal	Peoples Canal	Last Chance Canal	Consolid- ated Canal	Alta Canal	Liberty Canal	Crescent Canal	Stinson Canal	Burrel Ranch	Jane Main Canal	Beta Main Canal	Lake- lands Canal	South Fork	Clark's Fork	Upper San Jose	Huinan Canal	Empire No. 1	Empire No. 2	Lower Lace-	Water at Empire W. No. 2	River at Piedra
100	100	15	15	15	70	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	100	
200	200	15	15	15	100	70	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	200	
300	300	15	15	15	100	85	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	300	
400	400	15	15	15	100	90	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	400	
450	450	15	15	15	100	91	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	450	
500	500	15	15	15	100	91	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	500	
600	600	15	15	15	250	91	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	600
700	700	15	15	15	350	91	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	700
800	800	15	15	15	450	91	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	800
900	900	15	15	15	550	91	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	900
1000	1000	15	15	15	650	91	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	1000
1100	1100	15	15	15	750	91	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	1100
1200	1200	15	15	15	850	91	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	1200
1300	1300	15	15	15	950	91	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	1300
1400	1400	15	15	15	1000	91	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	1400
1500	1500	15	15	15	1150	91	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	1500
1600	1600	15	15	15	1200	93	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	1600
1700	1700	15	15	15	1250	118	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	1700
1800	1800	15	15	15	1300	120	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	1800
1900	1900	15	15	15	1300	143	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	1900
2000	2000	15	15	15	1300	155	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	2000
2100	2100	15	15	15	1350	158	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	2100
2200	2200	15	15	15	1350	160	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	2200
2300	2300	15	15	15	1350	168	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	2300
2400	2400	15	15	15	1350	168	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	2400
2500	2500	15	15	15	1350	168	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	2500
2600	2600	15	15	15	1350	168	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	2600
2700	2700	15	15	15	1350	168	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	2700
2800	2800	15	15	15	1350	168	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	2800
2900	2900	15	15	15	1350	168	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	2900
3000	3000	15	15	15	1350	175	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	3000
3100	3100	15	15	15	1350	175	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	3100
3200	3200	15	15	15	1350	175	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	3200
3300	3300	15	15	15	1350	175	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	3300
3400	3400	15	15	15	1350	175	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	3400
3500	3500	15	15	15	1350	175	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	3500
3600	3600	25	25	25	1450	175	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	3600
3700	3700	25	25	25	1450	175	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	3700
3800	3800	25	25	25	1450	175	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	3800
3900	3900	25	25	25	1450	175	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	3900
4000	4000	50	50	50	1450	200	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	4000
4100	4100	50	50	50	1450	200	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	4100
4200	4200	50	50	50	1450	200	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	4200
4300	4300	50	50	50	1450	200	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	4300
4400	4400	50	50	50	1450	225	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	4400
4500	4500	75	75	75	1450	225	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	4500
4600	4600	125	125	125	1450	225	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	4600
4700	4700	125	125	125	1450	225	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	4700
4800	4800	125	125	125	1450	225	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	4800
4900	4900	125	125	125	1450	225	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	4900
5000	5000	125	125	125	1450	225	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	5000
5100	5100	125	125	125	1450	225	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	5100
5200	5200	125	125	125	1450	225	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	5200
5300	5300	125	125	125	1450	225	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	5300
5400	5400	125	125	125	1450	225	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	5400
5500	5500	125	125	125	1450	225	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	5500
5600	5600	125	125	125	1450	225	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	5600
5700	5700	125	125	125	1450	225	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	5700
5800	5800	125	125	125	1450	225	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	5800
5900	5900	125	125	125	1450	225																			

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crease

Note: For flows above 16,650 cubic feet per second at Piedra, the excess is to be divided one-half to the Main River and North Fork and one-half to the South Fork

## AMENDED KINGS RIVER NO. 1 DIVERSION SCHEDULE

July -

River at Piedra	Main River at North Fork	Lapuna Dist.	Murphy Slough Asn.	Fresno Dist.	Lemoore Canal	Peoples Canal	Last Chance Canal	Consol- idated Canal	Alta Canal	Liberty Canal	Crescent Canal	Stinson Canal	Burrell Nanch	Janes Main Canal	Beta Main Canal	Lake- lands Canal	South Fork	Clark's Fork	Upper San Jose	Heinlein Canal	Empire No. 1	Empire No. 2	Lower Lance	Water at Piedra W.K.O.	River at Piedra
100	100	15	15	70																				100	
200	200	15	16	100	70																			200	
300	300	15	15	100	85	85																		300	
400	400	15	15	100	90	80	100																	400	
450	450	15	15	90	91	91	91	45																450	
500	500	15	15	100	91	91	91	46																500	
600	600	15	15	250	91	183	65																	600	
700	700	15	15	350	91	183	65																	700	
800	800	15	15	450	91	183	65																	800	
900	900	15	15	550	91	183	65																	900	
1000	1000	15	15	650	91	183	65																	1000	
1100	1100	15	15	750	91	183	65																	1100	
1200	1200	15	15	850	91	183	65																	1200	
1300	1300	15	15	950	91	183	65																	1300	
1400	1400	15	15	1050	91	183	65																	1400	
1500	1500	15	15	1150	91	183	65																	1500	
1600	1600	15	15	1250	91	183	65																	1600	
1700	1700	15	15	1350	91	183	65																	1700	
1800	1800	15	15	1450	130	260	130																	1800	
1900	1900	15	15	1550	140	285	142																	1900	
2000	2000	15	15	1650	150	310	155	50																2000	
2100	2100	15	15	1750	150	335	155	50																2100	
2200	2200	15	15	1850	167	355	168	150																2200	
2300	2300	15	15	1950	167	355	168	200	50															2300	
2400	2400	15	15	2050	167	355	168	200	50															2400	
2500	2500	15	15	2150	167	355	168	200	50															2500	
2600	2600	15	15	2250	167	355	168	300	50															2600	
2700	2700	15	15	2350	167	355	168	400	50															2700	
2800	2800	15	15	2450	167	355	168	500	50															2800	
2900	2900	15	15	2550	167	355	168	600	50															2900	
3000	3000	25	25	2650	167	355	168	700	50															3000	
3100	3100	25	25	2750	175	355	175	800	50															3100	
3200	3200	25	25	2850	175	355	175	900	50															3200	
3300	3300	25	25	2950	175	355	175	1000	50															3300	
3400	3400	25	25	3050	175	355	175	1100	50															3400	
3500	3500	25	25	3150	175	355	175	1200	50															3500	
3600	3600	25	25	3250	175	355	175	1300	50															3600	
3700	3700	25	25	3350	175	355	175	1400	50															3700	
3800	3800	25	25	3450	175	355	175	1500	50															3800	
3900	3900	25	25	3550	175	355	175	1600	50															3900	
4000	4000	25	25	3650	175	355	175	1700	50															4000	
4100	4100	25	25	3750	175	355	175	1800	50															4100	
4200	4200	25	25	3850	175	355	175	1900	50															4200	
4300	4300	25	25	3950	175	355	175	2000	50															4300	
4400	4400	25	25	4050	175	355	175	2100	50															4400	
4500	4500	25	25	4150	175	355	175	2200	50															4500	
4600	4600	25	25	4250	175	355	175	2300	50															4600	
4700	4700	15	15	4350	175	355	175	2400	50															4700	
4800	4800	200	200	490	225	450	225	1100	950															4800	
4900	4900	300	300	500	225	450	225	1100	950															4900	
5000	5000	300	300	500	225	450	225	1200	1025															5000	
5100	5100	300	300	500	225	450	225	1300	1000															5100	
5200	5200	300	300	500	225	450	225	1400	1075															5200	
5300	5300	300	300	500	225	450	225	1500	1000															5300	
5400	5400	300	300	500	225	450	225	1600	1075															5400	
5500	5500	300	300	500	225	450	225	1700	1000															5500	
5600	5600	300	300	500	225	450	225	1800	1075															5600	
5700	5700	300	300	500	225	450	225	1900	1000															5700	
5800	5800	300	300	500	225	450	225	2000	1075															5800	
5900	5900	300	300	500	225	450	225	2100	1000															5900	
6000	6000	300	300	500	225	450	225	2200	1075															6000	
6100	6100	325	325	500	225	450	225	100	100															6100	
6200	6200	325	325	500	225	450	225	100	100															6200	
6300	6300	325	325	500	225	450	225	100	100															6300	
6400	6400	325	325	500	225	450	225	100	100															6400	
6500	6500	325	325	500	225	450	225	100	100															6500	
6600	6600	325	325	500	225	450	225	100	100															6600	
6700	6700	325	325	500	225	450	225	100	100															6700	
6800	6800	325	325	500	225	450	225	100	100															6800	
6900	6900	325	325	500	22																				

## AMENDED KINGS RIVER MONTHLY FLOW SCHEDULE

- August -

River at Piedra	Main River and North Fork	Laguna Dist.	Murphy Slough Dist.	Prairie Dist.	Lemoore Canal	Peoples Canal	Last Chance Canal	Consolidated Canal	Alta Canal	Liberty Canal	Crescent Canal	Stimson Canal	Barrel Ranch	Jame Main Canal	Beta Main Canal	Lake-lands Canal	South Fork	Clark's Fork	Upper San Jose Canal	Heinlein Canal	Empire No. 1	Empire No. 2	Lower Lavelace	Water at Piedra
100	100	15	15	70																			100	
200	200	15	15	170																			200	
300	300	15	15	249	21																		300	
400	400	15	15	249	50	41																	400	
500	500	15	15	249	55	55																	500	
600	600	15	15	400	65	65																	600	
700	700	15	15	600	85	85																	700	
800	800	15	15	600	85	85																	800	
900	900	15	15	700	85	85																	900	
1000	1000	15	15	800	85	85																	1000	
1100	1100	15	15	900	85	85																	1100	
1200	1200	15	15	1000	85	85																	1200	
1300	1300	15	15	1100	85	85																	1300	
1400	1400	15	15	1200	85	85																	1400	
1500	1500	15	15	1300	85	85																	1500	
1600	1600	15	15	1300	85	85																	1600	
1700	1700	15	15	1300	95	85	85																1700	
1800	1800	15	15	1300	100	100	100																1800	
1900	1900	15	15	1300	105	105	100																1900	
2000	2000	75	75	1300	155	245	160																2000	
2100	2100	100	100	1300	180	270	150																2100	
2200	2200	100	100	1300	180	270	150	100															2200	
2300	2300	100	100	1300	180	270	150	200															2300	
2400	2400	150	150	1300	180	270	150	250															2400	
2500	2500	150	150	1300	180	280	170	250															2500	
2600	2600	150	150	1300	180	280	170	250															2600	
2700	2700	100	100	1300	180	300	150	250															2700	
2800	2800	100	100	1300	180	300	150	250															2800	
2900	2900	100	100	1318	181	351	119	155	470	16	2	6	1	1	2	7	1	1	2	6	1	1	2900	
3000	3000	100	100	1318	181	351	119	155	470	16	2	6	1	1	2	7	1	1	2	6	1	1	3000	
3100	3100	116	116	1345	353	357	166	512	48	5	18												3100	
3200	3200	190	126	354	276	171	532	64	7	24													3200	
3300	3300	195	126	354	276	171	532	64	7	27		80	80	80	80	80	80	80	80	80	80	80	3300	
3400	3400	350	126	354	276	171	532	64	7	30	100	100	100	100	100	100	100	100	100	100	100	100	3400	
3500	3500	208	126	354	276	171	532	64	7	33	150	150	150	150	150	150	150	150	150	150	150	150	3500	
3600	3600	208	126	354	276	171	532	64	7	35	160	160	160	160	160	160	160	160	160	160	160	160	3600	
3700	3700	208	126	354	276	171	532	64	7	38	170	170	170	170	170	170	170	170	170	170	170	170	3700	
3800	3800	208	126	354	276	171	532	64	7	41	180	180	180	180	180	180	180	180	180	180	180	180	3800	
3900	3900	208	126	354	276	171	532	64	7	44	190	190	190	190	190	190	190	190	190	190	190	190	3900	
4000	4000	208	126	354	276	171	532	64	7	47	200	200	200	200	200	200	200	200	200	200	200	200	4000	
4100	4100	208	126	354	276	171	532	64	7	50	210	210	210	210	210	210	210	210	210	210	210	210	4100	
4200	4200	214	144	352	435	267	800	584	2	34	3	1	1	1	1	1	1	1	1	1	1	1	4200	
4300	4300	214	144	352	435	267	800	584	2	34	3	1	1	1	1	1	1	1	1	1	1	1	4300	
4400	4400	214	144	352	435	267	800	584	2	34	3	1	1	1	1	1	1	1	1	1	1	1	4400	
4500	4500	214	144	352	435	267	800	584	2	34	3	1	1	1	1	1	1	1	1	1	1	1	4500	
4600	4600	214	144	352	435	267	800	584	2	34	3	1	1	1	1	1	1	1	1	1	1	1	4600	
4700	4700	214	144	352	435	267	800	584	2	34	3	1	1	1	1	1	1	1	1	1	1	1	4700	
4800	4800	214	144	352	435	267	800	584	2	34	3	1	1	1	1	1	1	1	1	1	1	1	4800	
4900	4900	214	144	352	435	267	800	584	2	34	3	1	1	1	1	1	1	1	1	1	1	1	4900	
5000	5000	214	144	352	435	267	800	584	2	34	3	1	1	1	1	1	1	1	1	1	1	1	5000	
5100	5100	214	144	352	435	267	800	584	2	34	3	1	1	1	1	1	1	1	1	1	1	1	5100	
5200	5200	215	150	205	108	414	50	263	72	5	9	5	9	107	14	730	30	50	10	100	100	100	5200	
5300	5300	215	150	205	108	414	50	263	72	5	9	5	9	107	14	730	30	50	10	100	100	100	5300	
5400	5400	215	150	205	108	414	50	263	72	5	9	5	9	107	14	730	30	50	10	100	100	100	5400	
5500	5500	215	150	205	108	414	50	263	72	5	9	5	9	107	14	730	30	50	10	100	100	100	5500	
5600	5600	215	150	205	108	414	50	263	72	5	9	5	9	107	14	730	30	50	10	100	100	100	5600	
5700	5700	215	150	205	108	414	50	263	72	5	9	5	9	107	14	730	30	50	10	100	100	100	5700	
5800	5800	215	150	205	108	414	50	263	72	5	9	5	9	107	14	730	30	50	10	100	100	100	5800	
5900	5900	215	150	205	108	414	50	263	72	5	9	5	9	107	14	730	30	50	10	100	100	100	5900	
6000	6000	215	150	205	108	414	50	263	72	5	9	5	9	107	14	730	30	50	10	100	100	100	6000	
6100	6100	215	150	205	108	414	50	263	72	5	9	5	9	107	14	730	30	50	10	100	100	100	6100	
6200	6200	215	150	205	108	414	50	263	72	5	9	5	9	107	14	730	30	50	10	100	100	100	6200	
6300	6300	215	150	205	108	414	50	263	72	5	9	5	9	107	14	730	30	50	10	100	100	100	6300	
6400	6400	215	150	205	108	414	50	263	72	5	9	5	9	107	14	730	30	50	10	100	100	100	6400	
6500	6500	215	150	205	108	414	50	263	72	5	9	5	9	107	14	730	30	50	10	100	100	100	6500	
6600	6600	215	150	205	108	414	50	263	72	5	9	5	9	107	14	730	30	50	10	100	100	100	6600	
6700	670																							

AMENDED KINGS RIVER MOULING DIVERSION SCHEDULE

- September -

River at Piedra	Main River and North Fork	Laguna Dist.	Murphy Slough Assn.	Fresno Dist.	Lebec Canal	Peoples Canal	Last Chance Canal	Consolidated Canal	Alt. Canal	Liberty Canal	Crescent Canal	Stimson Canal	Burrel Branch	Janes Main Canal	Beta Main Canal	Lake- lands Canal	South Fork	Clark's Fork	Upper San Joaquin	Belmen Canal	Empire No. 1	Empire No. 2	Water at Empire W.N.O. 2	River at Piedra	
100	100	15	15	70																					
200	200	16	16	170																					100
300	300	15	15	240	21																				200
400	400	15	15	440	50	41																			300
450	450	16	16	250	85	85																			400
500	500	16	16	300	85	85																			500
600	600	15	15	400	65	65																			600
700	700	15	15	500	85	85																			700
800	800	15	15	840	85	85																			800
900	900	15	15	700	85	85																			900
1000	1000	15	15	800	85	85																			1000
1100	1100	15	15	900	85	85																			1100
1200	1200	15	15	1000	85	85																			1200
1300	1300	15	15	1100	85	85																			1300
1400	1400	15	15	1100	90	160	30																		1400
1500	1500	15	15	1150	150	160	85																		1500
1600	1600	15	15	1200	150	150	85																		1600
1700	1700	75	75	1100	160	160	65																		1700
1800	1800	75	75	1100	160	160	65																		1800
1900	1900	75	75	1100	205	160	230																		1900
2000	2000	75	75	1100	250	160	235																		2000
2100	2100	75	75	1100	250	160	65																		2100
2200	2200	75	75	1100	250	160	65																		2200
2300	2300	75	75	1100	250	160	65																		2300
2400	2400	81	81	1100	250	160	65																		2400
2500	2500	85	1125	245	162	70	85	416	1	2	2	3	8	12	3	1	2	3	8	1	2	3	8	2500	
2600	2600	94	91	1143	273	167	81	79	426	4	7	6	4	6	8	9	1	2	3	8	1	2	3	8	2600
2700	2890	98	1156	280	173	86	102	441	5	9	8	5	8	10	12	10	10	10	10	10	10	10	10	2700	
2800	104	99	1156	284	175	86	105	442	6	10	9	5	9	12	14	10	10	10	10	10	10	10	10	2800	
2900	810	101	1174	289	180	92	143	459	7	12	10	6	10	13	16	9	10	10	10	10	10	10	10	2900	
2970	110	105	1165	293	165	95	149	668	7	13	11	7	12	15	18	10	10	10	10	10	10	10	10	2900	
3100	230	105	1191	298	187	99	185	675	8	15	13	7	13	16	20	170	50	50	70	20	20	20	20	3100	
3200	290	111	1200	306	190	104	181	684	9	16	14	8	14	18	21	210	50	50	70	0	0	0	0	3200	
3300	320	113	1200	307	193	105	183	684	10	17	15	9	15	18	23	240	50	50	70	100	100	100	100	3300	
3400	310	127	117	1219	312	198	106	214	704	11	19	16	10	17	21	26	280	50	50	70	100	100	100	100	3400
3500	310	131	121	1229	317	202	112	233	714	11	21	16	11	18	23	26	310	50	50	70	100	100	100	100	3500
3600	330	137	1278	322	208	120	230	715	12	22	17	12	20	25	30	340	50	50	70	100	100	100	100	3600	
3700	340	143	1280	327	210	120	269	735	13	24	21	13	21	28	31	310	50	50	70	100	100	100	100	3700	
3800	340	146	1260	332	214	124	287	745	14	25	22	14	23	28	34	400	30	50	70	100	100	100	100	3800	
3900	340	146	1270	336	217	126	308	755	15	27	23	15	24	30	37	430	30	50	70	100	100	100	100	3900	
4000	340	151	1270	342	222	125	314	765	15	27	23	15	25	30	37	430	30	50	70	100	100	100	100	4000	
4100	340	160	1270	346	225	125	324	775	16	30	28	16	27	34	41	430	30	50	70	100	100	100	100	4100	
4200	340	146	1280	356	230	126	360	786	17	32	28	16	26	35	45	520	30	50	70	100	100	100	100	4200	
4300	340	150	1311	356	234	145	375	796	18	32	29	17	26	35	45	550	30	50	70	100	100	100	100	4300	
4400	340	150	1319	356	237	146	394	804	19	35	30	18	31	39	47	590	30	50	70	100	100	100	100	4400	
4500	340	151	1319	356	237	146	401	810	20	35	30	18	31	39	47	590	30	50	70	100	100	100	100	4500	
4600	340	159	1337	372	244	152	426	822	20	36	33	21	33	42	51	670	30	50	70	100	100	100	100	4600	
4700	350	184	1345	377	246	146	441	830	21	39	34	22	35	43	51	710	30	50	70	100	100	100	100	4700	
4800	4050	166	1354	381	251	159	457	839	22	40	35	22	36	42	51	750	30	50	70	100	100	100	100	4800	
4900	4050	166	1354	381	256	159	457	840	22	40	35	22	36	42	51	750	30	50	70	100	100	100	100	4900	
5000	4050	166	1354	381	266	160	456	844	22	40	35	22	36	42	51	750	30	50	70	100	100	100	100	5000	
5100	4050	166	1354	381	266	160	456	845	22	40	35	22	36	42	51	750	30	50	70	100	100	100	100	5100	
5200	4050	166	1354	381	266	160	456	846	22	40	35	22	36	42	51	750	30	50	70	100	100	100	100	5200	
5300	4050	166	1354	381	266	160	456	847	22	40	35	22	36	42	51	750	30	50	70	100	100	100	100	5300	
5400	4050	166	1354	381	266	160	456	848	22	40	35	22	36	42	51	750	30	50	70	100	100	100	100	5400	
5500	5100	225	1522	469	818	220	761	1008	37	67	58	36	60	75	92	1920	30	50	70	100	100	100	100	5500	
5600	5200	225	1522	469	818	220	761	1008	37	67	58	36	60	75	92	1920	30	50	70	100	100	100	100	5600	
5700	5200	225	1522	472	821	223	774	1014	37	68	59	36	61	76	93	1945	30	50	70	100	100	100	100	5700	
5800	5200	230	1535	476	825	225	785	1021	38	68	59	36	62	76	94	2000	30	50	70	100	100	100	100	5800	
5900	5200	230	1541	476	825	225	785	1021	38	68	59	36	62	76	94	2000	30	50	70	100	100	100	100	5900	
6000	5300	230	1541	476	825	225	785	1021	38	68	59	36	62	76</td											

AMENDED KINGS RIVER DIVERSION SCHEDULE  
- October -

River at Piedra	Main River at North Fork	Main River at Peoples	River at Wair	Murphy	Peoples	Slosh	Fresno	Lebec	Consolidated Canal	Alta Canal	Liberty Canal	Crescent Canal	Stinson Canal	Burrell Ranch	Jones Main Canal	Beta Main Canal	Lake-lands Canal	South Fork	Clark's Fork	Upper San Jose	Einlen Canal	Empire No. 1	Empire No. 2	Lore-lace	Water at H.W.S.	River at Piedra
30	30	30	15	15					400																30	
100	100	100	15	15					70																100	
200	200	200	15	15					150																200	
300	300	300	15	15					250																300	
400	400	400	15	15					350																400	
500	500	500	15	15					450																500	
600	600	600	200	15					500																600	
700	700	700	15	15					550																700	
800	800	800	15	15					600																800	
900	900	900	15	15					650																900	
1000	1000	1000	55	55					700																1000	
1100	1100	1100	70	70	70	70	70	70	750																1100	
1200	1200	1200	725	70	100	205	275	75	75																1200	
1300	1300	1300	725	70	100	205	275	75	75																1300	
1400	1400	1400	72	102	385	281	77	485	485																1400	
1500	1500	1500	72	107	335	286	85	500	500	5	2	1	3	4	5	6	6	6	6	6	6	6	6	1500		
1600	1600	1600	65	115	319	292	85	52	144	5	4	4	3	4	5	6	6	6	6	6	6	6	6	1600		
1700	1700	1700	91	117	44	406	298	93	78	529	4	7	6	4	6	8	9	10	10	10	10	10	10	1700		
1800	1800	1800	97	125	57	413	503	98	102	546	6	9	7	5	7	10	12	10	10	10	10	10	10	1800		
1900	1900	1900	103	125	65	417	307	101	118	551	6	10	9	6	8	11	14	12	10	10	10	10	10	1900		
2000	2000	2000	105	125	64	425	305	102	125	559	6	10	9	6	8	11	15	14	12	10	10	10	10	2000		
2100	2100	2100	108	131	63	426	314	109	149	566	6	13	11	7	11	18	150	50	50	50	50	50	50	2100		
2200	2200	2200	112	135	64	431	317	111	165	577	6	14	12	8	13	16	19	170	30	50	50	50	50	50	2200	
2300	2300	2300	118	135	65	436	321	114	181	586	10	16	13	9	14	17	210	30	50	50	50	50	50	2300		
2400	2400	2400	120	135	64	440	324	114	196	594	10	17	15	9	15	18	210	30	50	50	50	50	50	2400		
2500	2500	2500	124	139	64	445	328	121	216	604	11	19	16	10	17	21	260	30	50	50	50	50	50	2500		
2600	2600	2600	129	145	60	450	332	125	615	12	20	17	11	18	23	28	310	30	50	50	50	50	50	2600		
2700	2700	2700	134	145	140	455	336	129	621	13	22	19	12	19	24	30	340	30	50	50	50	50	50	2700		
2800	2800	2800	135	145	140	456	340	133	625	13	24	20	13	21	26	32	340	30	50	50	50	50	50	2800		
2900	2900	2900	145	160	160	466	344	137	627	145	25	22	14	22	28	34	400	30	50	50	50	50	50	2900		
3000	3000	3000	147	160	170	471	348	140	506	15	27	23	14	22	30	37	450	30	50	50	50	50	50	3000		
3100	3100	3100	152	165	160	476	352	144	524	16	28	24	15	25	32	39	460	30	50	50	50	50	50	3100		
3200	3200	3200	155	165	161	481	356	148	534	17	29	25	16	27	33	41	510	30	50	50	50	50	50	3200		
3300	3300	3300	161	173	201	487	360	152	550	18	31	27	18	26	35	43	520	30	50	50	50	50	50	3300		
3400	3400	3400	165	177	211	492	364	156	576	19	31	29	19	29	37	45	540	30	50	50	50	50	50	3400		
3500	3500	3500	170	180	220	498	368	159	594	20	34	30	20	30	38	47	590	30	50	50	50	50	50	3500		
3600	3600	3600	173	185	228	502	370	163	606	21	35	31	21	31	39	48	600	30	50	50	50	50	50	3600		
3700	3700	3700	177	185	235	508	375	165	615	22	37	32	22	32	41	51	610	30	50	50	50	50	50	3700		
3800	3800	3800	181	199	246	510	376	168	641	731	22	39	35	22	32	43	53	710	30	50	50	50	50	50	3800	
3900	3900	3900	185	192	254	514	382	171	657	740	22	40	35	23	34	44	54	750	30	50	50	50	50	50	3900	
4000	4000	4000	189	195	263	519	385	175	672	749	22	41	36	24	37	46	57	780	30	50	50	50	50	50	4000	
4100	4100	4100	193	201	264	523	389	179	687	764	22	42	37	24	37	47	58	800	30	50	50	50	50	50	4100	
4200	4200	4200	196	201	261	528	392	181	694	766	25	44	38	25	39	49	61	810	30	50	50	50	50	50	4200	
4300	4300	4300	200	204	289	532	396	184	702	776	26	46	39	26	41	50	63	910	30	50	50	50	50	50	4300	
4400	4400	4400	204	209	295	537	399	188	706	785	26	47	41	26	42	52	64	940	30	50	50	50	50	50	4400	
4500	4500	4500	205	211	299	543	404	192	710	796	26	48	42	27	43	53	65	950	30	50	50	50	50	50	4500	
4600	4600	4600	210	215	312	544	408	193	716	806	26	49	45	28	44	54	68	1050	30	50	50	50	50	50	4600	
4700	4700	4700	215	215	312	544	408	193	716	806	26	50	46	29	45	66	61	1100	30	50	50	50	50	50	4700	
4800	4800	4800	216	216	312	545	408	194	717	807	26	51	47	29	46	67	62	1150	30	50	50	50	50	50	4800	
4900	4900	4900	217	217	312	545	408	195	718	808	26	52	48	29	47	68	63	1160	30	50	50	50	50	50	4900	
5000	5000	5000	217	217	312	545	408	195	718	808	26	53	49	29	47	68	64	1170	30	50	50	50	50	50	5000	
5100	5100	5100	218	218	312	546	408	196	719	809	26	54	50	29	47	69	65	1180	30	50	50	50	50	50	5100	
5200	5200	5200	219	219	312	546	408	197	720	810	26	55	51	29	47	70	66	1190	30	50	50	50	50	50	5200	
5300	5300	5300	221	221	312	547	409	198	721	811	26	56	52	30	47	71	67	1200	30	50	50	50	50	50	5300	
5400	5400	5400	222	222	312	547	409	199	722	812	26	57	53	30	47	72	68	1210	30	50	50	50	50	50	5400	
5500	5500	5500	223	223	312	548	409	200	723	813	26	58	54	30	47	73	69	1220	30	50	50	50	50	50	5500	
5600	5600	5600	224	224	312	548	409	200	724	814	26	59	55	30	47	74	70	1230	30	50	50	50	50	50	5600	
5700	5700	5700	224	224	312	548	409	200	725	815	26	60	56	30	47	75	71	1240	30	50	50	50	50	50	5700	
5800	5800	5800	225	225	312	549	409																			

AMENDED KINGS RIVER MOTEL

River at Folsom	Main River at North Fork	River at Laguna Dist.	Murphy Slough Dist.	Fresno Dist.	Lemoore Dist.	People's Canal	Last Canal	Consolidated Canal	Alta Canal	Liberty Canal	Crescent Canal	Stimmons Canal	James Main Canal	Beta Main Canal	Lake- lands Canal	Upper San Jose Canal	Reinlen Canal	Clark's Fork	Upper South Fork	Clark's Fork	Empire No. 1	Empire No. 2	Empire Love- lace	Water at Empire W.N.O.2	River at Folsom
30	30	30	15	15																					.30
100	100	100	15	15																					100
200	200	200	15	15																					200
300	300	300	15	15																					300
400	400	330	15	15																					400
450	450	330	15	15																					450
500	500	330	15	15																					500
600	600	400	15	15																					600
700	700	400	15	15																					700
800	800	400	15	15																					800
900	900	600	15	15																					900
1000	1000	600	25	25																					1000
1100	1100	650	50	50																					1100
1200	1200	86	55	15	148	406	6	26	465	1	2	2	1	2	2	3	5	3	3						.50
1300	1300	65	29	165	412	11	52	479	3	4	2	1	4	6	8	9	10	12	10	10					1300
1400	1400	69	65	43	175	417	17	79	463	4	5	9	8	6	10	11	12	14	10	10					1400
1500	1500	75	70	80	212	100	100	21	100	10	10	10	10	10	10	10	10	10	10	10					1500
1600	1650	79	74	65	184	452	24	118	515	6	10	5	6	9	12	14	15	16	10	10					1600
1700	1810	85	76	74	188	450	27	134	624	7	12	10	6	10	15	16	10	30	30	30					1700
1800	1870	86	80	83	193	453	30	149	533	7	13	11	7	12	15	16	130	30	30	30					1800
1900	1940	90	83	91	197	457	31	161	541	8	15	13	7	13	16	17	130	20	20	20					1900
2000	1780	94	86	100	202	440	37	181	650	9	16	14	8	14	18	19	210	20	20	20					2000
2100	1850	98	89	109	206	444	40	198	559	10	17	15	9	16	19	23	250	30	30	30					2100
2200	1820	102	92	119	212	448	44	214	569	11	19	16	10	17	21	26	280	30	30	30					2200
2300	1990	107	96	131	217	452	49	227	579	11	21	19	11	19	23	28	310	30	30	30					2300
2400	2040	112	100	138	222	456	51	251	581	12	22	21	12	20	25	30	340	30	30	30					2400
2500	2130	116	105	150	227	460	55	269	500	15	24	21	15	21	26	32	370	30	30	30					2500
2600	2200	121	107	160	233	464	59	287	610	11	27	22	14	22	28	34	400	30	30	30					2600
2700	2250	126	110	170	238	468	63	302	625	15	27	22	15	24	30	37	450	30	30	30					2700
2800	2340	130	114	180	243	472	66	324	650	15	29	25	16	24	32	39	460	30	30	30					2800
2900	2410	135	118	190	248	476	70	342	640	15	30	26	17	27	34	41	490	30	30	30					2900
3000	2480	139	121	201	253	480	74	360	651	17	32	28	18	35	45	50	550	30	30	30					3000
3100	2550	144	124	214	258	484	78	379	665	15	33	29	19	37	45	50	600	30	30	30					3100
3200	2620	148	128	219	263	487	81	394	669	19	35	30	20	31	49	57	650	30	30	30					3200
3300	2690	152	131	228	266	491	84	410	678	20	36	31	20	32	49	59	830	30	30	30					3300
3400	2730	155	134	237	272	494	87	426	687	20	38	33	21	34	42	51	670	30	30	30					3400
3500	2790	157	137	241	276	498	91	441	696	21	39	34	22	35	45	53	710	30	30	30					3500
3600	2850	163	144	251	281	501	94	457	704	22	41	35	22	36	45	53	750	30	30	30					3600
3700	2910	166	143	263	286	505	97	473	713	23	42	36	23	37	46	57	790	30	30	30					3700
3800	2970	170	147	272	290	508	100	484	723	23	43	37	24	39	48	59	830	30	30	30					3800
3900	3030	174	150	280	295	512	105	504	730	24	45	39	24	40	49	61	870	30	30	30					3900
4000	3090	178	154	289	299	516	110	525	745	25	47	41	25	42	52	64	910	30	30	30					4000
4100	3150	182	158	295	304	519	110	535	748	26	47	41	26	43	52	64	950	30	30	30					4100
4200	3200	185	160	306	307	522	115	549	755	26	48	42	26	44	53	66	1000	30	30	30					4200
4300	3250	188	164	311	311	532	115	562	762	27	49	43	27	45	55	68	1050	30	30	30					4300
4400	3300	191	168	314	314	536	115	565	765	28	50	46	28	46	56	69	1100	30	30	30					4400
4500	3350	195	172	317	317	539	115	569	768	29	51	47	29	47	57	70	1150	30	30	30					4500
4600	3400	201	174	321	321	543	120	571	772	30	52	48	30	51	58	70	1200	30	30	30					4600
4700	3450	206	178	326	326	547	120	575	776	30	55	50	30	55	65	75	1250	30	30	30					4700
4800	3500	214	182	330	330	551	120	579	780	31	57	53	31	57	66	76	1280	30	30	30					4800
4900	3550	220	187	334	334	556	120	583	784	31	58	54	31	58	67	77	1300	30	30	30					4900
5000	3600	224	191	338	338	560	120	587	788	32	59	55	32	59	68	78	1320	30	30	30					5000
5100	3650	228	195	342	342	564	120	591	792	32	60	56	32	60	69	79	1340	30	30	30					5100
5200	3700	232	199	346	346	568	120	595	796	33	61	57	33	61	70	80	1360	30	30	30					5200
5300	3750	236	203	350	350	572	120	600	800	34	62	58	34	62	71	81	1380	30	30	30					5300
5400	3800	240	207	354	354	576	120	604	804	35	63	59	35	63	72	82	1400	30	30	30					5400
5500	3850	244	211	358	358	580	120	608	808	36	64	60	36	64	73	83	1420	30	30	30					5500
5600	3900	249	215	362	362	584	120	612	812	37	65	61	37	65	74	84	1440	30	30	30					5600
5700	3950	253	219	366	366	588	120	616	816	38	66	62	38	66	75	85	1460	30	30	30					5700
5800	4000	257	223	370	370	592	120	620	820	39	67	63	39	67	76	86	1480	30	30	30					5800
5900	4050	261	227	374	374	596	120	624	824	40	68	64	40	68	77	87	1500	30	30	30					5900
6000	4100	265	231	378	378	600	120	628	828	41	69	65	41	69	78	88	1520	30	30	30					6000
6100	4150	269	235	382	382	604	120	632	832	42	70	66	42	70	79	89	1540	30	30	30					6100
6200	4200	273	239	386	386	608	120	636	836	43	71	67	43	71	80	90	1560	30	30	30					6200
6300	4250	277	243	390	390	612	120	640	840	44	72	68	44	72	81	91	1580	30	30	30					6300
6400	4300	281	247	394	3																				

All of  
the in-

Note: For flows above 11,100 cubic feet per second at Pisgah, the excess is to be divided

## AMENDED KINGS RIVER DIVERSION SCHEDULE

December

River at Fleets	Main River and North Park	Laguna Dist.	Murphy Slough Assn.	Presno Dist.	Lenore Canal	Peoples Canal	Last Chances Canal	Consolidated Canal	Alta Canal	Liberty Canal	Crescent Canal	Stinson Canal	Burrell Ranch	Jones Main Canal	Beta Main Canal	Lake- lands Canal	South Park	Clark's Fork	Upper San Jesse	Heinlen Canal	Empire No. 1	Empire No. 2	Lower Lovelace	Water at Empire No. 2	River at Piedra
100	100	15	15	100	70	85	85	113	85	15	1	2	1	10	10	10	10	10	25	5	20	20	100	100	
200	200	15	15	100	70	85	85	113	85	15	2	4	2	20	20	20	20	20	60	10	60	60	200	200	
300	300	15	15	100	70	85	85	113	85	15	2	4	2	20	20	20	20	20	60	10	60	60	200	200	
400	400	15	15	100	70	90	90	120	90	15	1	2	1	20	20	20	20	20	60	10	60	60	200	200	
450	450	15	15	100	70	90	90	120	90	15	1	2	1	20	20	20	20	20	60	10	60	60	200	200	
500	500	15	15	100	70	90	90	120	90	15	1	2	1	20	20	20	20	20	60	10	60	60	200	200	
600	600	40	40	150	95	180	92	180	95	15	1	2	1	20	20	20	20	20	60	10	60	60	200	200	
700	700	60	60	150	130	225	95	180	95	15	1	2	1	20	20	20	20	20	60	10	60	60	200	200	
800	800	50	50	150	130	275	95	180	95	15	1	2	1	20	20	20	20	20	60	10	60	60	200	200	
900	900	50	50	150	130	275	95	180	95	15	1	2	1	20	20	20	20	20	60	10	60	60	200	200	
1000	1000	55	55	135	125	325	95	180	95	15	1	2	1	20	20	20	20	20	60	10	60	60	200	200	
1100	1100	62	59	190	276	357	113	85	15	1	2	1	20	20	20	20	20	60	10	60	60	200	200		
1200	1200	64	61	217	279	360	132	50	31	2	4	2	20	20	20	20	20	60	10	60	60	200	200		
1300	1300	76	68	243	285	384	132	74	47	4	7	3	20	20	20	20	20	60	10	60	60	200	200		
1400	1380	72	71	268	285	387	141	97	61	5	9	4	20	20	20	20	20	60	10	60	60	200	200		
1500	1500	75	75	265	285	387	147	132	70	6	12	9	20	20	20	20	20	60	10	60	60	200	200		
1600	1510	90	76	229	290	372	153	127	70	6	12	9	20	20	20	20	20	60	10	60	60	200	200		
1700	1670	94	79	315	294	374	155	142	89	7	13	6	20	20	20	20	20	60	10	60	60	200	200		
1800	1690	99	81	338	294	376	165	157	98	7	14	7	20	20	20	20	20	60	10	60	60	200	200		
1900	1750	102	84	348	294	378	170	157	106	6	16	8	20	20	20	20	20	60	10	60	60	200	200		
2000	1760	107	85	364	298	376	178	165	117	9	11	8	20	20	20	20	20	60	10	60	60	200	200		
2100	1820	112	89	562	301	383	183	204	128	10	19	9	20	20	20	20	20	60	10	60	60	200	200		
2200	1890	117	92	561	302	386	221	139	11	20	10	20	20	20	20	20	60	10	60	60	200	200			
2300	1940	99	45	562	303	389	157	230	11	22	11	20	20	20	20	20	60	10	60	60	200	200			
2400	2030	127	98	458	308	391	204	256	181	12	22	12	20	20	20	20	20	60	10	60	60	200	200		
2500	2100	101	101	457	310	393	211	273	172	14	22	13	20	20	20	20	20	60	10	60	60	200	200		
2600	2170	104	104	476	316	395	216	291	185	14	27	13	20	20	20	20	20	60	10	60	60	200	200		
2700	2200	101	107	481	313	399	220	304	184	15	28	14	20	20	20	20	20	60	10	60	60	200	200		
2800	2310	146	110	613	317	401	230	326	185	15	30	15	20	20	20	20	20	60	10	60	60	200	200		
2900	2380	151	112	611	320	404	234	343	216	16	32	16	20	20	20	20	20	60	10	60	60	200	200		
3000	2450	115	115	612	322	407	240	350	227	17	33	17	20	20	20	20	20	60	10	60	60	200	200		
3100	2450	120	120	613	323	409	245	353	237	18	35	17	20	20	20	20	20	60	10	60	60	200	200		
3200	2470	120	120	613	326	411	257	359	246	18	36	18	20	20	20	20	20	60	10	60	60	200	200		
3300	2630	129	129	613	326	413	265	405	255	19	37	19	20	20	20	20	20	60	10	60	60	200	200		
3400	2690	125	125	614	331	415	269	420	265	20	39	19	20	20	20	20	20	60	10	60	60	200	200		
3500	2700	127	127	615	331	416	270	420	265	20	39	19	20	20	20	20	20	60	10	60	60	200	200		
3600	2810	101	130	646	335	420	301	450	315	21	37	21	20	20	20	20	20	60	10	60	60	200	200		
3700	2870	133	132	662	337	422	287	465	293	22	43	22	20	20	20	20	20	60	10	60	60	200	200		
3800	2930	135	135	639	342	429	292	480	308	23	44	22	20	20	20	20	20	60	10	60	60	200	200		
3900	2940	134	134	699	341	428	298	494	312	23	46	23	20	20	20	20	20	60	10	60	60	200	200		
4000	3050	129	129	651	342	431	299	502	311	23	47	23	20	20	20	20	20	60	10	60	60	200	200		
4100	3100	202	142	754	345	430	509	622	529	25	48	24	20	20	20	20	20	60	10	60	60	200	200		
4200	3150	204	144	737	347	432	514	555	537	25	50	24	20	20	20	20	20	60	10	60	60	200	200		
4300	3200	209	146	751	348	434	519	547	545	26	51	24	20	20	20	20	20	60	10	60	60	200	200		
4400	3210	219	146	750	349	435	520	546	547	26	52	24	20	20	20	20	20	60	10	60	60	200	200		
4500	3250	216	146	750	347	435	522	548	549	26	53	24	20	20	20	20	20	60	10	60	60	200	200		
4600	3260	215	146	751	347	435	523	549	550	26	54	24	20	20	20	20	20	60	10	60	60	200	200		
4700	3270	217	147	751	347	435	524	550	551	26	55	24	20	20	20	20	20	60	10	60	60	200	200		
4800	3270	217	147	751	347	435	524	550	552	26	56	24	20	20	20	20	20	60	10	60	60	200	200		
4900	3290	218	147	751	347	435	524	551	552	26	57	24	20	20	20	20	20	60	10	60	60	200	200		
5000	3300	218	147	751	347	435	524	551	553	26	58	24	20	20	20	20	20	60	10	60	60	200	200		
5100	3310	219	148	751	347	435	524	552	554	26	59	24	20	20	20	20	20	60	10	60	60	200	200		
5200	3320	219	148	751	347	435	524	552	555	26	60	24	20	20	20	20	20	60	10	60	60	200	200		
5300	3330	219	148	751	347	435	524	552	556	26	61	24	20	20	20	20	20	60	10	60	60	200	200		
5400	3340	219	148	751	347	435	524	552	557	26	62	24	20	20	20	20	20	60	10	60	60	200	200		
5500	3350	219	148	751	347	435	524	552	558	26	63	24	20	20	20	20	20	60	10	60	60	200	200		
5600	3360	219	148	751	347	435	524	552	559	26	64	24	20	20	20	20	20								

The following exhibits to this complaint are available at:

[https://www.waterboards.ca.gov/waterrights/water\\_issues/programs/applications/petitions/fas\\_kings.html](https://www.waterboards.ca.gov/waterrights/water_issues/programs/applications/petitions/fas_kings.html)

**Exhibit C**

Consolidated Irrigation District, Fresno Irrigation District, and Alta Irrigation District Petition to Revise FAS

**Exhibit D**

Consolidated Irrigation District, Fresno Irrigation District, and Alta Irrigation District Application to Appropriate Water

**Exhibit E**

Semitropic Water Storage District Petition to Revise FAS and Application to Appropriate Water