

Archived: Tuesday, August 2, 2022 2:38:42 PM

From: djackson@tcwater.org

To: [Dennis Mills](#) [Charlotte Gallock](#) [Wyrick, Jeof](#)

Cc: [Amer Hussain](#) [Jason Howard](#) (jason.howard@mccormickbarstow.com)

Subject: RE: TLSB Addendum - SWKGSA

Importance: Normal

Sensitivity: None

I appreciate your responses and understand that each of you will be considering or have already adopted the Addendum as distributed by Geosyntec, and I will convey this to SWKGSA's board. It is my hope that the board will adopt the addendum and continue to work on improving upon the groundwork that has been completed to date, even if they are not fully satisfied with the current revisions.

Best regards,

Deanna Jackson

Executive Director
Tri-County Water Authority
Southwest Kings GSA
944 Whitley Ave., Suite E
Corcoran, CA 93212
T (559) 762-7240
C (559) 786-5648
tcwater.org

From: Dennis Mills <dennis.kingsc wd@outlook.com>

Sent: Wednesday, July 20, 2022 1:07 PM

To: djackson@tcwater.org <djackson@tcwater.org>

Cc: [Amer Hussain](mailto:ahussain@Geosyntec.com) <ahussain@Geosyntec.com>; [Jason Howard](mailto:jason.howard@mccormickbarstow.com) (jason.howard@mccormickbarstow.com) <jason.howard@mccormickbarstow.com>; [Charlotte Gallock](mailto:cgallock@krcd.org) <cgallock@krcd.org>; [Wyrick, Jeof](mailto:jwyrick@jgboswell.com) <jwyrick@jgboswell.com>

Subject: Re: TLSB Addendum - SWKGSA

Deanna,

I have several thoughts on the concerns expressed by the SWK GSA and the requested addition in Section 3.1.2. My understanding is these concerns and this request come from the SWK GSA Board President, John Vidovich. First, given the open animosity between Mr. Vidovich and Boswell over the last couple years, it is impossible to not view this as an extension of that well documented conflict. Second, Mr. Vidovich is an extremely wealthy individual who is heavily involved in two of the five TLS GSAs, being the SWK GSA and the TCWA. Given his direct involvement and abundant resources it doesn't make sense that this message is being delivered now, after the GSP Addendum document has been circulated prior to Board meetings for approval. And relatedly, this kind of last minute change is the same thing that was attempted prior to the 2020 GSP approval. Third, the request is rather disjointed in that there is first a contention that specifics about demand reduction schedules are not sufficient, but the suggested language for Section 3.1.2 doesn't seem to relate to that. Fourth, the suggested concept and language for Section 3.1.2 is not simple or clear. There are many private facilities of varying size across the subbasin that are used to reregulate pumped groundwater, including in the MKR GSA. I personally know very little about the time duration of storage, length of seasonal use, seepage losses versus evaporative losses or involvement of surface water related to these facilities. This language is very broad and seems to be presented as if all GSA parties should understand the same information and related concerns that are being expressed and I don't think that is the case. At the very least, some justifiable estimate of the amount of groundwater being discussed should be developed and provided. Also, if the issue was shown to be significant for the subbasin, it seems there are available management strategies to minimize evaporative

losses from basins that could be employed rather than trying to prevent or restrict storage. Fifth, the conclusion that avoiding evaporative losses from stored groundwater would lessen pumping in the deep aquifer and lessen subsidence seems somewhat speculative. More information would need to be presented to show that this would be the likely or expected outcome. For instance, I could also see landowners responding by drilling additional deep wells so that seasonal peak flows could be recovered without utilizing storage, and that would seem to have the opposite effect.

For the reasons listed above, I am not supportive of including the suggested language at this time. The material in the GSP Revisions and the 2020 GSP generally have been discussed at length by all GSA parties. This one, however, hasn't been a part of those subbasin level conversations, and it appears to require more information before it could be viewed as a reasonable strategy for the whole subbasin.

Sincerely,
Dennis Mills
Kings CWD / MKR GSA

From: Charlotte Gallock <cgallock@krcd.org>
Sent: Wednesday, July 20, 2022 8:28 AM
To: Wyrick, Jeof <jwyrick@jgboswell.com>; djackson tcwater.org <djackson@tcwater.org>; Dennis Mills <dennis.kingscwgwd@outlook.com>
Cc: Amer Hussain <ahussain@Geosyntec.com>; Jason Howard (jason.howard@mccormickbarstow.com) <jason.howard@mccormickbarstow.com>
Subject: RE: TLSB Addendum - SWKGSA

Deanna,

Since the SFK GSA will be adopting this tomorrow, and the draft has been posted and out for our Board and any interested parties to review, we can't agree to this change at this time.

Regards,
Charlotte Gallock

From: Wyrick, Jeof <jwyrick@jgboswell.com>
Sent: Tuesday, July 19, 2022 1:29 PM
To: djackson tcwater.org <djackson@tcwater.org>; Charlotte Gallock <cgallock@krcd.org>; Dennis Mills <dennis.kingscwgwd@outlook.com>
Cc: Amer Hussain <ahussain@Geosyntec.com>; Jason Howard (jason.howard@mccormickbarstow.com) <jason.howard@mccormickbarstow.com>
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This is not acceptable at this late date. We adopt at 3:00. Mr. Vidovich tried to wreck three subbasins (Kern, Tule and Tulare Lake) at the last minute in 2020. Now he tries again. DWR does not appreciate his antics.

Mr Vidovich trying to bring his spurious claims into the document will not be adopted by El Rico. He has pending litigation, and the courts will decide. The alternative is to do a re-write to point out all the illegal movement of water that Mr Vidovich is doing. However, we leave this to the courts.

Jeof

From: djackson tcwater.org <djackson@tcwater.org>
Sent: Tuesday, July 19, 2022 12:53 PM
To: Charlotte Gallock <cgallock@krcd.org>; Dennis Mills <dennis.kingscwgwd@outlook.com>; Wyrick, Jeof <jwyrick@jgboswell.com>

Cc: Amer Hussain <ahussain@Geosyntec.com>; Jason Howard (jason.howard@mccormickbarstow.com)
<jason.howard@mccormickbarstow.com>

Subject: TLSB Addendum - SWKGSA

TLSB Managers,

SWKGSA has expressed concerns regarding the Addendum and is requesting a modification. The concern is that the plan falls short of sustainability, does not have a well-defined timeline for demand reduction, and does not address groundwater storage that is inefficient. After much discussion it was decided that I request that the following language be added to the addendum, under Section 3.12 Protective Efforts. ***“ Surface Storage of Groundwater - To the extent allowable by law, the GSAs will work with local and state regulatory agencies to prevent the inefficient storage of groundwater in shallow basins. This practice results in a significant loss of the pumped groundwater to evaporation. Avoiding these losses to evaporation would help in reducing groundwater pumping from the deep aquifer and lessen subsidence.”***

If the GSAs can agree on this addition to the addendum SWKGSA will likely approve.

Please contact me if you have questions regarding the request.

Best regards,

Deanna Jackson

Executive Director
Tri-County Water Authority
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