Smith Holly

From:	Gordon <gordoncjones@gmail.com></gordoncjones@gmail.com>
Sent:	Tuesday, March 21, 2017 2:25 PM
То:	HEE Exhibits
Subject:	FW: Public Hearing - HB 2705; HB 2706; HB 2707

Please submit this as written testimony.

Thanks,

Gordon C. Jones

Dear Committee Members:

I am writing in support of the above referenced House Bills that are coming before you for consideration. As a business owner and owner of two properties with significant water rights and use issues, I want to strongly support HB 2705, HB 2706 and HB 2707. I am currently waiting to complete an application process for water rights on three wells and the completion of a mitigation plan that has been ongoing since 2004 (Lake Creek Lodge's Ground Water Application (G-17871 and Instream Transfer/Mitigation (T-11891). I can vouch for the fact that the Oregon Department of Water Resources is understaffed and unable to complete their work in a timely and reasonable manner. Please see the email thread below that might shed some light on just how difficult it is to get a completed application and final determination from Oregon Department of Water Resources; even when the instream transfer and mitigation plan were essentially negotiated and agreed to in advance, and the work designed and performed by, and with the support of, the Upper Deschutes Watershed Council, US Forest Service, ODFW and several other public agencies.

- <u>I support HB 2705</u> because the inventory and measurement of water use is critically important and is not currently being addressed. I know for a fact that in the Metolius Basin there are numerous diversions, improper irrigation systems and unapproved ponds that divert instream water resources. This need to monitor water use has been identified as a need across the state for decades, but little progress has been made despite continued calls for smarter water management. Knowing how much and how quickly we are using our water resources is critical to ensuring fair and sensible management decisions especially when considering new water permit applications in water scarce regions.
- <u>I support HB 2707</u> because one of the key findings of a December 2016 audit of the Oregon Water Resources Department's effectiveness is that groundwater protection is needed to give us a baseline from which to operate and make decisions on new applications. However, at the pace of only two groundwater basin studies completed every five years, it will take decades to have a full accounting of our groundwater resources. Nearly one million Oregonians rely on groundwater for their drinking water source, and groundwater demand is increasing. More than 5,000 farms in Oregon rely on well water to survive. Groundwater also supplies a base flow for rivers, lakes, streams and wetlands an important consideration for maintaining the health of Oregon's fish runs and spectacular landscapes. And, we need once and for all to remove the damns on the Klamath River and resolve the water issues in the Klamath Basin!
- <u>I support HB 2706</u> because I have personally experienced an unacceptable delay in my application to the State for a groundwater transfer permit and mitigation plan. Based on my application, the ODWR has issued a Preliminary Determination for Instream Transfer T-11891 / Mitigation Project MP-192. This transfer is proposed as a mitigation project for Permit Application G-17871 for Lake Creek Lodge. Both have apparently been approved, subject to completion of the public notice and process. However, the lack of staff and funding has held the process up repeatedly, and in the past year it has been shuffled from one person to another and now yet a third, without resolution just as it has since it was first submitted in 2004! A December 2016 audit of the Oregon Water Resources Department found that the agency is chronically underfunded and lacks the resources to adequately manage our state's surface and ground-waters. Without a stable funding source, the Department

can't fulfill its responsibilities to ensure the long-term sustainability of Oregon's rivers and water supplies, economy, and quality of life.

Email thread over the past couple of years:

Sent from my email today:

Dear Lanaya:

A month has now passed since I received this email from Lisa Jaramillo advising me that the file for Lake Creek Lodge has been assigned to you for review. My email to Lisa, below, describes my concerns regarding the lack of progress on the application. I believe that I've done everything required and provided Oregon Water Resources Department with a complete and thorough property report sufficient to post the notice in the Nuggest Newspaper asking for public comment. Please inform me of your work on the file and what, if anything, I need to do to move this along to completion.

Regards,

Gordon

From: JARAMILLO Lisa J * WRD [mailto:Lisa.J.Jaramillo@oregon.gov]
Sent: Tuesday, February 21, 2017 5:45 PM
To: Gordon
Cc: BLAKELY Lanaya F * WRD
Subject: RE: File 127552 13375 SW Forest Service Rd., Camp Sherman, OR 97730

Thank you Gordon. I will forward this on to the person that will be handling your file while Laura is out. Her name is Lanaya Blakely and she can be contacted at: <u>Lanaya.F.Blakely@oregon.gov</u> or 503-986-0888. She will be reviewing the documents you sent.

Please let me know if I can be of any further assistance. -Lisa

Lisa J. Jaramillo

Transfer and Conservation Section Manager Water Right Services Division Oregon Water Resources Department Phone: 503-986-0880 <u>Lisa.J.Jaramillo@oregon.gov</u>

From: Gordon [mailto:gordoncjones@gmail.com]
Sent: Friday, February 17, 2017 4:58 PM
To: JARAMILLO Lisa J * WRD
Subject: FW: File 127552 13375 SW Forest Service Rd., Camp Sherman, OR 97730

Not sure if this went through on my first attempt, since I sent it to Laura's email address and got another "out of office" reply.

From: Gordon [mailto:gordoncjones@gmail.com]
Sent: Friday, February 17, 2017 1:47 PM
To: 'WILKE Laura K * WRD'
Cc: 'Adam Sussman'
Subject: RE: File 127552 13375 SW Forest Service Rd., Camp Sherman, OR 97730

Hi Lisa,

Thanks for getting back to me. Here's my concern: This mitigation process and exchange of the water rights held by Lake Creek Lodge, both for irrigation directly out of Lake Creek, as well as the water rights on the constructed pond, began in 2004. We committed our cooperation with the Upper Deschutes Watershed Council and US Forest Service, including a cash contribution and in-kind work contribution, on a removal of the pond and a complete restoration of Lake Creek to its' natural meander bed for the purpose of restoring anadromous fish runs into the upper reaches of Lake Creek, Suttle Lake and Link Creek. We were simultaneously working with Bob Main to receive in exchange, water rights on our three wells and "relocated fishing pond" to an upland location away from the creek, as requested by Oregon Department of Fish and Wildlife. Unfortunately, Bob died from cancer before the project was finally approved. Although, I wasn't aware that it still needed final approval, as my understanding was that our mitigation plan and donation of our water rights to the State were complete. However, I apparently missed a deadline to file a form or document. We then had to reapply using our consultant GSI, at a significant additional expense, and that process has now gone on for nearly three years (see attached letter from GSI).

My current understanding is that we are approved by the State, and are now at a point that we need to place a notice in a local newspaper giving the public a chance to respond to our mitigation plan and request for water rights. Laura Wilke has twice required that we provide a more "thorough" property report through the title company. I've recently asked Laura to confirm that the latest Property Report is complete and answers all of her questions and concerns. I've not heard back from her as to whether or not I need to now contact the adjacent property owners of tax lots 500 and 501, and who also own their Driveway which is an extension of Blakely Ln. And even possibly Jefferson County or the US Forest Service, who owns the ROW for Camp Sherman Road and get their signatures on an additional document (affidavit of cancellation and/or consent to the transfer). This seems like a rather extreme over-reach to me, but if I need to do it then please let me know just as soon as possible. I've copied from her email the three questions below that I am asking clarification on; as to whether she is now satisfied with the updated report that clarifies ownerships, or if I still need to get documents signed consenting to the cancellation and transfer.

- 1. The deeded landowner would also need to provide an affidavit of cancellation for the portion of the right proposed for cancellation off of lots 500 and 501
- 2. SW Blakely Road. The updated ownership report provided also does not cover the roadway. In addition, the "owner" of the roadway will need to provide notarized consent to the transfer.
- 3. A portion of the place of use proposed for cancellation also appears to be located within the boundaries of SW Camp Sherman Road. This roadway appears to be specifically excluded from the property description. To cancel the portion of the water right located within the right of way, authorization (affidavit of cancellation) will need to be provided by the "owner" of the roadway along with documentation showing ownership by the appropriate entity.

I don't want this to go on for another three or four years and then have to start all over again. I am respectfully requesting that you please do everything possible to expedite this application and complete the process.

Best Regards,

Gordon C. Jones

Cc: 'Adam Sussman' Subject: RE: File 127552 13375 SW Forest Service Rd., Camp Sherman, OR 97730

Hi Gordon,

Laura Wilke is going to be out of the office for the nxt few weeks; however, I will be working with one of our other technical staff to keep your file moving forward. We received the new property report and will be reviewing it shortly. We will be in touch with you as soon as we complete that review.

If you have any questions or concerns, please feel free to contact.

Thank you for your patience and have a nice evening, -Lisa

Lisa J. Jaramillo

Transfer and Conservation Section Manager Water Right Services Division Oregon Water Resources Department Phone: 503-986-0880 Lisa.J.Jaramillo@oregon.gov

From: Gordon [mailto:gordoncjones@gmail.com]
Sent: Thursday, February 09, 2017 4:07 PM
To: WILKE Laura K * WRD
Cc: 'Adam Sussman'
Subject: FW: File 127552 13375 SW Forest Service Rd., Camp Sherman, OR 97730

Hi Laura,

I had the title company remove the lease that showed up in the property report, as it had long since expired. I look forward to hearing back from you as to what I need to do next.

Thanks,

Gordon

From: Daniel Hise [mailto:dhise@westerntitle.com]
Sent: Wednesday, February 08, 2017 1:27 PM
To: gordoncjones@gmail.com
Subject: File 127552 13375 SW Forest Service Rd., Camp Sherman, OR 97730

Hi Gordon,

Here's the report without the lease. Also could you, would you forward this to Laura Wilke? There was a slight error in the vesting and I'm sure she'll want to see the lease removed.

Thanks,

Dan

From: WILKE Laura K [mailto:laura.k.wilke@state.or.us] Sent: Tuesday, October 25, 2016 12:05 PM To: Gordon C Jones (gordoncjones@gmail.com) (gordoncjones@gmail.com) <gordoncjones@gmail.com> Cc: Adam Sussman <a sussman@gsiws.com>; GIFFIN Jeremy T <jeremy.t.giffin@state.or.us>; FRENCH Kim R <kim.r.french@state.or.us>

Subject: Draft Preliminary Determination for Instream Transfer T-11891 / Mitigation Project MP-192

Greetings:

Please find attached the draft Preliminary Determination and cover letter for Instream Transfer T-11891 / Mitigation Project MP-192. This transfer is proposed as a mitigation project for Permit Application G-17871 for Lake Creek Lodge.

Please give me a call if you have any questions.

Thank you, Laura Wilke Flow Restoration Program Coordinator Oregon Water Resources Department

On Oct 13, 2016, at 10:40 AM, WILKE Laura K <<u>laura.k.wilke@state.or.us</u>> wrote:

Hi Gordon – the instream transfer is actually one I hope to be working on next. Unless there's any unforeseen issues, I'm hoping to have the draft Preliminary Determination to you before the end of this month if not sooner.

Thanks, Laura

From: Gordon [mailto:gordoncjones@gmail.com]
Sent: Monday, October 10, 2016 10:23 PM
To: 'WILKE Laura K'
Cc: 'FRENCH Kim R'; 'Adam Sussman'; 'Jeff Barry'; 'GIFFIN Jeremy T'
Subject: FW: T-11891 and G-17871 (Lake Creek Lodge)

Laura,

Can you please send me another update, or in the alternative complete the process and grant our instream transfer/mitigation project for Lake Creek Lodge.

Thanks,

Gordon

From: Gordon [mailto:gordoncjones@gmail.com]
Sent: Thursday, August 18, 2016 12:30 PM
To: 'WILKE Laura K'
Cc: 'Adam Sussman'; 'Jeff Barry'; 'GIFFIN Jeremy T'; 'FRENCH Kim R'
Subject: RE: T-11891 and G-17871 (Lake Creek Lodge)

Thanks, Laura. I appreciate the progress report. Gordon

From: WILKE Laura K [mailto:laura.k.wilke@state.or.us]
Sent: Thursday, August 18, 2016 12:28 PM
To: Gordon
Cc: 'Adam Sussman'; 'Jeff Barry'; 'GIFFIN Jeremy T'; 'FRENCH Kim R'
Subject: RE: T-11891 and G-17871 (Lake Creek Lodge)

Gordon – I wanted to send you a quick note to update you on the progress of reviewing the instream transfer/mitigation project for Lake Creek Lodge. I have substantially completed review of the transfer/mitigation project and am awaiting some additional information from other Department staff. Once I have the last of the information I need, I believe that I will be able to put together the first report associated with the transfer application review process.

Please feel free to e-mail or give me a call if you have any questions. My direct line is (503) 986-0884.

Thanks, Laura Wilke

From: Gordon [mailto:gordoncjones@gmail.com]
Sent: Monday, May 23, 2016 3:17 PM
To: 'WILKE Laura K'
Cc: 'Adam Sussman'; 'Jeff Barry'; 'GIFFIN Jeremy T'; 'FRENCH Kim R'
Subject: RE: T-11891 and G-17871 (Lake Creek Lodge)

Hi Laura,

I'm just checking in to see if you have made any progress.

Gordon

From: WILKE Laura K [mailto:laura.k.wilke@state.or.us]
Sent: Wednesday, April 27, 2016 11:16 AM
To: Gordon
Cc: 'Adam Sussman'; 'Jeff Barry'; GIFFIN Jeremy T; 'FRENCH Kim R'
Subject: RE: T-11891 and G-17871 (Lake Creek Lodge)

Greetings Gordon – thank you for periodically checking in with me on the status of this transfer application. I wish I could say that significant progress has been made. Unfortunately, things did not happen as I had anticipated. However, I have added this transfer to the files that I am actively working on. Please feel free to check back with me again.

Laura

From: Gordon [mailto:gordoncjones@gmail.com]
Sent: Monday, April 25, 2016 6:15 PM
To: 'WILKE Laura K'
Cc: 'Adam Sussman'; 'Jeff Barry'; 'FRENCH Kim R'
Subject: RE: T-11891 and G-17871 (Lake Creek Lodge)

Laura,

Would it be possible to get an update on the review of our transfer application and final order? You were optimistic that the review process would begin early to mid-2016. Are you still on track with that proposed schedule?

Regards,

Gordon

From: Gordon [mailto:gordoncjones@gmail.com] Sent: Thursday, January 28, 2016 10:58 AM To: 'WILKE Laura K' **Cc:** 'Adam Sussman'; 'FRENCH Kim R'; Jeff Barry (<u>jbarry@gsiwatersolutions.com</u>) **Subject:** RE: T-11891 and G-17871 (Lake Creek Lodge)

Thanks, Laura,

I appreciate the update and also hope that you will have a better feel for a timeline "sometime soon". It still feels very unfair to me that I have been down this road once before, and when I was issued an ultimatum that I had to respond by a certain date and wasn't able to, my application was denied and I had to start over at great expense. The State, however, is held to no such timeline or obligation to perform their duties by a given date or deadline. Why is this? I have no assurance that you or GSI will remember to follow up on this application or make sure that it is processed before it expires. You, Kim French, and Adam Sussman may all have moved on to other jobs before this reaches a conclusion, just as Bob Main passed away while we were waiting for the first application to be processed. It all makes me very insecure to say the least!

Gordon

From: WILKE Laura K [mailto:laura.k.wilke@state.or.us]
Sent: Thursday, January 28, 2016 9:07 AM
To: Gordon
Cc: 'Adam Sussman'; Jeff Barry; FRENCH Kim R
Subject: RE: T-11891 and G-17871 (Lake Creek Lodge)

Greetings Mr. Gordon:

A caseworker has been assigned to transfer application T-11891. At this point, I anticipate being the caseworker on that application. Unfortunately, I've not yet had an opportunity start reviewing the application. I hope to have a better feel for a timeline, considering other pending instream transfer applications as well, sometime soon.

I also touched base with Kim French, the caseworker associated with groundwater permit application G-17871, this morning. There's nothing in the processing of the transfer application that we can see at this point that would cause the groundwater permit application to expire. The groundwater application has been issued the first of three reports in its application process, the initial review. Next step would be the Proposed Final Order. Last step in that process is the Final Order. Kim has been holding off on any further processing of the permit application until the transfer application catches up. It's the issuance of a final order for the groundwater permit application that triggers a potential expiration date on that application since permit applicants have 5 years from the date the final order is issued to have mitigation in place.

Please feel free to check back in with me again.

Thank you, Laura Wilke

From: Gordon [mailto:gordoncjones@gmail.com]
Sent: Wednesday, January 27, 2016 12:15 PM
To: 'WILKE Laura K'
Cc: 'Adam Sussman'; FRENCH Kim R; Jeff Barry
Subject: RE: T-11891 and G-17871 (Lake Creek Lodge)

Dear Ms. Wilke,

As you are aware, I am very concerned about the review and approval process that we are stuck in regarding Lake Creek Lodge's Ground Water Application (G-17871 and Instream Transfer/Mitigation (T-11891). It is apparent that the last

time this application was reviewed was September 8, 2014, at which time it was considered complete. In your email below on September 22, 2015, you assured me that you would assign it to a caseworker within the next month. Have you done so at this time, and is that caseworker Kim French? Again, I am very concerned that this unreasonable and unacceptable delay in getting a decision will result in another expiration of the application process. I am leaving for two months of travel at the end of this week, and I would like to know if any progress has been made on the application, and when we can expect a decision.

I will anxiously await your prompt reply.

Thank You,

Gordon

From: WILKE Laura K [mailto:laura.k.wilke@state.or.us]
Sent: Wednesday, September 23, 2015 12:49 PM
To: Gordon
Cc: 'Adam Sussman'; 'FRENCH Kim R'
Subject: RE: T-11891 and G-17871 (Lake Creek Lodge)

Mr. Jones:

Thank you for the additional information about the history of this project. I'll make sure this information is included in the application file.

Sincerely, Laura Wilke

From: Gordon [mailto:gordoncjones@gmail.com]
Sent: Wednesday, September 23, 2015 12:45 PM
To: 'WILKE Laura K'
Cc: 'Adam Sussman'; 'FRENCH Kim R'
Subject: RE: T-11891 and G-17871 (Lake Creek Lodge)

Laura,

Thanks again for taking the time to review the status of our application and for reassuring me that we haven't been entirely forgotten! I know that these things take time, and that you are underfunded and understaffed, but I am concerned that as time passes people will forget that we have already done a great deal to mitigate this request/application. The entire mitigation plan was, of course, conceived, planned and designed in collaboration with our Lake Creek Lodge consultant, Bob Main, Ryan Houston of the Upper Deschutes Watershed Council and the Oregon Watershed Enhancement Board beginning in 2003. The hands-on work and much of the funding for removal of the "instream" pond and weirs from Lake Creek, and the reconstruction of its' historical thread and gravels, woody material etc., was accomplished by the US Forest Service, ODFW, US Dept. of Fish & Wildlife, the Oregon Department of Environmental Quality and the Army Corps of Engineers in 2006. All irrigation and diversions from Lake Creek ceased and pumps were removed. The entire lodge operation was shut down for two months for this work to take place. New clear span bridges had to be built to the specifications of the state agencies and Jefferson County as well. A new upland pond was constructed the following year, a new well drilled and the new system of irrigation, filling and maintaining the new pond, and our use of groundwater was implemented in 20008 as part of that overall plan. Our investments in this entire process were considerable, but it was something that we believed in and felt was the right thing to do for the Community, the State, the Deschutes/Metolius river system, and especially for the return of the lost fish runs. Unfortunately, with Bob's passing this process did not get finalized, and we were forced to start over with GSI and a new application. I just want to make sure that the history of this application is considered and not forgotten (please see attached article on the Gene Leo award).

Sincerely,

Gordon C. Jones

From: WILKE Laura K [mailto:laura.k.wilke@state.or.us]
Sent: Tuesday, September 22, 2015 1:04 PM
To: Gordon
Cc: 'Adam Sussman'; FRENCH Kim R
Subject: RE: T-11891 and G-17871 (Lake Creek Lodge)

Hello Mr. Jones:

I just checked in with Kim French on the permit application (G-17871). We took a look at the initial review (completed August 2014) together. The Initial Review requested a revised map and a response to our notice of mitigation obligation. It looks like we received both of those documents on September 8, 2014. At this point, it looks like you've done what you need to do for that application.

As mentioned, the instream transfer/mitigation project should be assigned to a specific caseworker sometime within the next month – hopefully sooner. I wanted to add that once that happens, we may be better able to assess when the application will likely be reviewed. I'm optimistic that the review process may begin early to mid-next year and am hopefully not being overly optimistic. Please feel free to check back again on the application.

Laura Wilke

From: Gordon [mailto:gordoncjones@gmail.com]
Sent: Tuesday, September 22, 2015 11:52 AM
To: 'WILKE Laura K'
Cc: 'Adam Sussman'
Subject: RE: T-11891 and G-17871 (Lake Creek Lodge)

Laura,

Thank you for the call this morning regarding Lake Creek Lodge's Ground Water Application (G-17871 and Instream Transfer/Mitigation (T-11891). Per our conversation you expect to assign the mitigation portion of the application to a staff worker within a week or two and hope to have a resolution by early to mid-year of 2016. The ground water portion of the application has been assigned to Kim French (503) 986-0816, and you will check with her as to what progress she has made and if there is any additional follow up required at this time. I've also now heard from Adam Sussman and he is following up as well.

Thanks again for filling me in on the process and assuring me that you will do your best to keep things moving forward.

Gordon Jones

From: WILKE Laura K [mailto:laura.k.wilke@state.or.us]
Sent: Tuesday, September 22, 2015 10:32 AM
To: Adam Sussman
Cc: FRENCH Kim R; STARNES Kelly; FRENCH Dwight W; Gordon C Jones (gordoncjones@gmail.com)
Subject: RE: T-11891 and G-17871 (Lake Creek Lodge)

Adam:

We are working our way towards being able to process this application. We anticipate that the application will be assigned to a caseworker sometime in the next month. While there are a number of transfer applications pending in

front of this particular application, we are hopeful that review will happen in the near future. Within the last year plus we have added 3 additional transfer staff to review of instream transfers. And we anticipate filling two transfer positions in the next month or so, which will increase our capacity for processing all transfers even further.

I also received a call from Mr. Jones yesterday. I'll give him a call back this morning as well.

Thanks, Laura

From: Adam Sussman [mailto:ASussman@gsiws.com]
Sent: Monday, September 21, 2015 2:32 PM
To: WILKE Laura K
Cc: FRENCH Kim R; STARNES Kelly; FRENCH Dwight W; Gordon C Jones (gordoncjones@gmail.com)
Subject: RE: T-11891 and G-17871 (Lake Creek Lodge)

Laura et. al.:

I am once again checking in on these two applications on behalf of Lake Creek Lodge. We understand that the Initial Review on Groundwater Permit Application G-17871 was issued in August 2014 but is waiting on being connected with required mitigation under instream transfer T-11891. The instream transfer has been pending since September 2014. The Lodge is anxious to move forward. Can you please provide an update and schedule for moving these applications forward.

Sincerely,

Adam

Adam Sussman Principal Water Resources Consultant | GSI Water Solutions, Inc. direct: 541-257-9001 | cell: 541-602-5188 1600 SW Western Blvd., Suite 240, Corvallis, OR 97333 www.gsiws.com| bio | asussman@gsiwatersolutions.com

From: WILKE Laura K [mailto:laura.k.wilke@state.or.us]
Sent: Monday, February 09, 2015 9:25 AM
To: Adam Sussman
Cc: FRENCH Kim R; STARNES Kelly
Subject: FW: T-11891 and G-17871 (Lake Creek Lodge)

Good Morning Adam:

Kim and I have previously touched based on the transfer and mitigation project and made sure that they were linked together. This transfer hasn't been assigned to a staff person yet but I think I'll end up working on this transfer as it will be the first on in the Metolius Basin and that zone of impact. Presently there are about 12 other instream transfers pending in front of this one. And I think there's several other regular transfers as well.

Time wise, I think we're still a ways off from being able to pick up this transfer.

Laura

From: STARNES Kelly Sent: Monday, February 09, 2015 8:18 AM To: WILKE Laura K Subject: FW: T-11891 and G-17871 (Lake Creek Lodge) Here ya go!

Thanks!

Kelly

From: Adam Sussman [mailto:ASussman@gsiws.com]
Sent: Sunday, February 08, 2015 8:45 PM
To: Kelly Starnes (patrick.k.starnes@state.or.us)
Cc: FRENCH Kim R (kim.r.french@state.or.us)
Subject: T-11891 and G-17871 (Lake Creek Lodge)

Kelly:

Can you tell me the status of T-11891 and which staff person it has been assigned to? This transfer is a mitigation project that goes with G-17871 which Kim French is working on. Want to make sure they stay together and are tracking.

Any update from you end, Kim?

Thanks,

Adam

Adam Sussman

Principal Water Resources Consultant | GSI Water Solutions, Inc. direct: 541-257-9001 | cell: 541-602-5188 1600 SW Western Blvd., Suite 240, Corvallis, OR 97333 www.gsiws.com | bio | asussman@gsiwatersolutions.com

Please consider this correspondence in your decision making, and enter it into the record.

Kind Regards,

Gordon C. Jones