



INDIAN WELLS VALLEY WATER DISTRICT



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June 10, 2025

Scott Hayman, Chairman
Indian Wells Valley Groundwater Authority
100 West California Avenue
Ridgecrest, CA 93555

Dear Chairman Hayman:

This letter shall acknowledge receipt of your May 27, 2025, letter on behalf of the Indian Wells Valley Groundwater Authority (IWVGA) requesting mediation.

We agree that mediation could benefit all in the Indian Wells Valley. The District also agrees that any successful mediation must further sustainable groundwater management in a responsible, cost-effective manner which will serve the best interests of the community. Mediations are most productive when the parties agree on an agenda and communicate their expectations prior to the start of mediation. To that end, we provide the IWVGA with the following detailed proposal for mediation.

First, to limit the issues to a manageable number, we propose that mediation focus on the most critical and urgent issues facing our respective agencies: specifically, the determination of safe yield and the amount of groundwater in storage:

- (a) Determination of Safe Yield / Sustainable Yield. The independent mediator will consider evidence from the parties on the science used to estimate the basin's safe or sustainable yield.
- (b) Determination of Water in Storage. The independent mediator will consider evidence from the parties on the science used to estimate the amount of groundwater in storage.

We recognize that certain other aspects related to basin sustainability are also in question and may be appropriate for future mediation. However, the foregoing two issues are set to be tried during the adjudication's second phase of trial commencing June 1, 2026. The Court almost certainly will expect the parties to explore settlement, including participating in mediation, prior to the Phase 2 Trial. Moreover, the other disputed issues cannot be fully entertained until these two fundamental basin characteristics are determined.

Second, our proposal focuses on the disputed science that has been developed for the basin. Given the technical nature of the proposed subject, we propose a fully independent and qualified expert in water rights and the science used to estimate safe/sustainable yield and groundwater in storage to facilitate the mediation. Preferably, the mediator would be a retired judicial officer.

Third, and related to the preceding point, given the technical nature of the proposed subject for mediation, we believe the parties would benefit from the exchange of expert reports—scheduled for August 12, 2025—prior to the mediation occurring. These reports could also be provided to the independent mediator to aid the mediator's understanding. The District would be prepared to commence mediation forty five (45) days after the exchange of expert reports.

Fourth, our perspective remains consistent with SGMA's premise that the best solutions are those that include the full participation of local water users. Accordingly, any mediation for this basin should include not only our respective agencies, but also the United States Navy, Searles Valley Minerals, representatives of large and small farming, as well as representatives of de minimis pumpers.

If you or your staff have further questions, do not hesitate to contact George Croll or the undersigned. My contact information is below. We look forward to hearing from you and working with you.

Best regards,



David Saint-Amand, President
Indian Wells Valley Water District
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Cc:

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