

August 13, 2007

IWV Water District Board of Directors,

The hydrology basis given in the INDIAN WELLS VALLEY WATER DISTRICT INITIAL STUDY AND DRAFT MITIGATED NEGATIVE DECLARATION FOR THE 2007/2008 WATER SUPPLY IMPROVEMENT PROJECT is remarkably limited and incomplete, especially for our aquifer that is in critical overdraft. Assessment of water quality issues is absent. The draft is woefully inadequate for drawing conclusions about potential water-related impacts. The history of water pumping in this valley, available references, and your own groundwater diagrams show the seriousness of potential impacts.

To ensure groundwater availability and quality beyond the short term, and for your continued credibility, I urge that you do NOT adopt this draft.

A final report needs to include important missing information and mitigations. It needs to include more thorough hydrology modeling and in-depth assessment of water-quality chemistry and physical phenomena. When additional data and issues are considered, it becomes clear that the thoroughness of an Environmental Impact Report is necessary to address the potentially serious impacts associated with high-capacity pumping of our groundwater.

Because of well-location errors in the draft and limited hydrology and absent water-quality information, I sought advice and received it from three experts:

- A water-quality expert with over 30 years experience in aquatic toxicology, limnology, impact assessment and mitigation
- A geohydrologist
- A civil engineer with hydrology experience

All three kinds of experts agreed that placement of high-capacity wells 35 and 36 within ½-mile of private wells and each other is reason for concern. Other District wells, to be refitted for high capacity, are similarly close to private wells and each other.

I have delivered to the Board, four letters that summarize my major concerns about what the Draft does not adequately address:

1. Effects of lowered groundwater locally and across the aquifer.
2. Pumping effects that concentrate arsenic and total dissolved solids such as calcium carbonate.
3. Long-term and cumulative effects.
4. Missing information that allowed the Board to incorrectly answer “Less Than Significant” or “No Impact” in response to some CEQA issues, and thus to make an overall determination that is incorrect.

You have the opportunity to vote down this draft and then do it right. You can produce a credible plan and assessment that meets all of your responsibilities as a public-service provider. Because our aquifer is in critical overdraft, those responsibilities go beyond just your customers. Don't seek a short-term solution that is temporarily less expensive for your customers but causes economic hardship to others now and hurts us all over the long term. By voting down this draft, you can then honorably fulfill your role among the stewards of our valley's water. Will you do this?

Sincerely,

Annette DeMay
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