

August 7, 2007 #1

Indian Wells Valley Water District – Board of Directors
PO Box 399
Ridgecrest, CA 93556

Dear Board Members:

This letter is regarding the **INDIAN WELLS VALLEY WATER DISTRICT INITIAL STUDY AND DRAFT MITIGATED NEGATIVE DECLARATION FOR THE 2007/2008 WATER SUPPLY IMPROVEMENT PROJECT, MAY 2007**, with focus on **effects of lowered groundwater locally and across the aquifer.**

Inadequate Hydrology Data. The only hydrology basis given in the DRAFT is 90-day drawdown simulation and an out-of-context misuse of selected information from the Bureau of Reclamation. The map of wells in FIGURE 2 of 2 and the Location table in the Hydrogeologic section both contain significant errors. Because of this limited and erroneous information, I sought expert advice and received it from three experts:

- an aquatic toxicologist and mitigation specialist
- a geohydrologist
- a civil engineer with hydrology experience.

Proximity of Wells. All the experts resoundingly agreed that placement of proposed high-capacity wells 35 and 36, both within ½-mile of private wells and each other is reason for concern. Anywhere on that property is too close to neighboring wells (300 ft, 1/8 – ½ mile away). More District wells, to be refitted for high capacity, are similarly close to private wells and each other. Your own consulting engineer, Mr. Charles Krieger, can inform you of reasons for concern.

Permitting of those larger production wells should include conditions to mitigate impacts to neighboring wells. That might include piping undiminished-quality water supply to neighbors or drilling the neighboring residential wells to deepen them, at no increased cost to neighbors.

Barbara Houghton's Study. She is clear that drawdown tests were meant to reproduce what was done in 1996 "with an additional time interval of 90 days to simulate longer term effects." 90 days is not sufficient to consider cumulative hydrogeologic effects. Still, she showed serious interference among the District's own wells. She states 6 disclaimers, acknowledging her study does not cover important hydrology issues.

Misleading Reference. In section VII. HYDROLOGY AND WATER QUALITY Issue b, out-of-context and partial information from Indian Wells Valley Groundwater Project (U.S. Bureau of Reclamation, 1993) is cited. This obscures the "Potentially Significant Impact" on our aquifer that is in critical overdraft. The DRAFT (p 38) claims "with appropriate management, the existing ground water resources will provide acceptable quality water for approximately 160 years without additional imported supplies." That statement omits important information on the same page of the Bureau's report that

makes the quote invalid. The *appropriate management* required by the Bureau of Rec. includes both water conservation throughout the valley and mixing of poor-with good-quality water (starting in 1993). The report's conservative estimate is only 35 years if aquifer management remained basically unchanged, which better represents what has happened.

Unfounded Conclusions. It is illogical to claim "No Impact" on the many private-well owners near your proposed high-capacity wells. Local and broader effects on the aquifer are so potentially serious they also must be investigated, and described with mitigations or the plan revised, BEFORE final conclusions can be approved.

Some Failures of Process. The District plans to *nearly double* its extraction capacity with 1,000 – 2,500 gpm wells. This fails to recognize the critical overdraft of the aquifer, documented for years and already 2-feet per year in the area from which the *doubling* is planned. The plan fails California Water Code Section 10910 requirements to avoid negative impacts on existing customers. It fails to provide additional documentation required when a critical overdraft is present. It fails to recognize the water rights of others. Lowering groundwater beyond the reach of shallower private wells will cause costly redrilling, lower property values, and force some people to move.

Please Respond. Please add discussion of these concerns—of the experts, the Bureau of Rec. report, and citizens—to a revised draft and include mitigations or revise the plan to avoid these potentially serious problems. Also give me your written credible responses to these concerns.

For the Record. I request this letter be entered into the official comment record of the formal Public Hearing of the Negative Declaration.

Thank you for your consideration.

Sincerely,

Annette DeMay
Ridgecrest, CA 93555
CC:

Ms. Lorelei Oviatte, Kern County Senior Planner
Mr. Jon McQuiston, Kern County District 1 Supervisor
IWW Cooperative Groundwater Management Group