

July 27, 2007

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**. To ensure water availability and quality beyond the short term, and for the credibility of dedicated Water District Board Directors, Manager, and your contracted consultants, I urge that you do NOT adopt this draft. A final version needs to include important missing information and mitigations for the benefit of all.

The draft document should NOT be approved because it does not address the following major concerns:

1. Crucial geohydrology and water-quality information was not included in the draft. Reference sources that adequately support “less than significant impact” on hydrology and “no impact” on water quality are missing. Sources that indicate “potentially significant” impacts are excluded.
2. The 90-day drawdown simulation is inadequate to serve as the only assessment of hydrology in the draft document, a fact that is stated in 6 different ways by investigator Barbara Houghton.
3. Partial information from the Indian Wells Valley Groundwater Project (U.S. Bureau of Reclamation, 1993) leads to an incorrect conclusion; the optimal 160-year prediction of acceptable water from the aquifer is stated despite its corresponding management practices not having occurred, but the conservative 35-year prediction that better corresponds with how the aquifer has been used is not mentioned. Realistic projection is necessary.
4. The aquifer has been in critical overdraft for years. Thus, total water supplies available during future decades including multiple dry years need to be explicitly discussed.
5. Reviews of existing hydrology studies/data need to be summarized in the declaration, and modeling of future performance done, before implementing a plan to “double” groundwater extraction capacity by the District.
6. Water-quality degradation (e.g. total dissolved solids, arsenic concentration) due to multiple high-capacity production wells near each other and private wells, and operated with repeated drawdowns, must be investigated and explicitly reported before drilling or refitting wells to pump 2,500 gpm.
7. Impacts of lowered groundwater on nearby private wells due to repeated localized drawdowns of high-capacity wells and to the southwest field in general cannot be ignored or hidden in whole-valley averages.
8. Essential information about cumulative pumping effects is absent.
9. Non-District water supply entitlements and rights are not assessed, thus omitting human and local impacts.
10. Incorrect answers of “Less Than Significant” or “No Impact” about multiple issues are due to incomplete and/or error-containing information; changed answers are needed.
11. Three categories of ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED should be checked (page 13) because each has at least one “Potentially Significant Impact” that is not mitigated in the draft—Mandatory Findings of Significance, Hydrology/Water Quality, and Population/Housing (pages 37a, 38b, 40f, 47c, 56b & c).
12. The overall DETERMINATION (page 14) is incorrect because issues and impacts are inadequately addressed as required by CEQA, California Water Code 10910, and Kern County protections for existing water users.

For each item above please provide—to me and a revised draft—missing facts and discussion and any additional mitigations, before approving a mitigated negative declaration. When all procedures required for a project of the proposed scope have been followed both in spirit and detail, you can have a document that is to your credit.

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
Lahontan Regional Water Quality Board
IWV Groundwater Management Working Group