

Letter 14

received
12/07/11

From: Donna K. Smiley
PO Box 655
(1511 S. Brown Rd.)
Inyokern, CA 93527

To: Tom Mulvihill, General Manager
Indian Wells Valley Water District
PO Box 1329
Ridgecrest, CA 93555

7 December 2011

Subj: Opposition to the IWV Water District Water Supply Improvement Project 2011

As a resident of Inyokern, located on property extremely close to existing IWVWD wells, not to mention the new proposed wells, I am in opposition to your WSIP plan.

Not only is it unnecessary given the static nature of the valley's population and the fact that current wells are providing very adequately, it also will have a hugely negative impact on my own well on my property located southwest of the Brown Road/Bowman Road intersection.

Please desist in these short-sighted plans and instead put your efforts into further conservation efforts !

Sincerely,



Donna K. Smiley
Kingsbury@iwvisp.com
760-377-4758

14-1

**WATER SUPPLY IMPROVEMENT PROJECT
FINAL ENVIRONMENTAL IMPACT REPORT**

Response to Comment 14-1: This comment states that the WSIP is not needed because the Indian Wells Valley's population is static and the existing IWWVD can provide adequate water. Population projections were provided by Kern COG, and fall within the range of projections used by the City of Ridgecrest in its General Plan (1 to 3 percent) and Kern County in its General Plan (2 percent). It should be noted that the District only produces groundwater in response to actual water demands from its customers. It does not have the ability to store large quantities of water for which there is no demand. If population increases do not occur, or if demand is low because of conservation or cooler weather, then the new facilities would only be operated as needed to satisfy the actual demand. Master Responses 7 and 8 further address this issue.

This comment further states that the Proposed Project would have a negative impact on the commentator's well, located southwest of the Brown Road/Bowman Road intersection. This comment states that implementation of the Proposed Project would cause water level drops in nearby wells. As discussed in Section 3.8.3.3 of the Draft EIR, the Proposed Project would cause water levels at wells within 2 miles of Well 35 to decline at a rate that is slightly higher than the current rate of decline. The difference between the current baseline rate of decline and the rate of decline that could occur with the Proposed Project is a potentially significant impact. Mitigation has been provided to ensure that existing land uses will be supported in the future. Master Responses 1 through 4 address this issue.

Letter 15

received
12/8/11

To : Mr. Tom Mulvilhill, General Manager IWVWD.

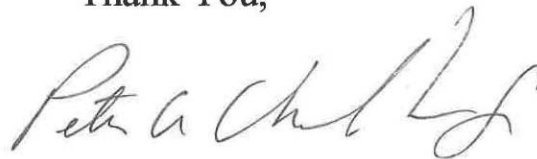
From: Mr. Peter Chilbes Jr.

Subject: Water District Water Supply Improvement
Project. (WSIP)

As an Indian Wells Valley Water District customer and a private well owner, I would like to convey my opposition to the WSIP. I firmly believe that enhancing our present water supply is a much better approach than over-pumping the south-west part of the valley. As a rate payer and as private well owner, this project has the potential to severely affect my family financially. Please consider other alternative projects that extend our present water resources.

15-1

Thank You,



**WATER SUPPLY IMPROVEMENT PROJECT
FINAL ENVIRONMENTAL IMPACT REPORT**

Response to Comment 15-1: This comment states that an alternative to the Proposed Project, such as enhancing the present water supply should be selected. The District considered other alternatives, including aggressive conservation, blending, saline water recovery, water reclamation, and water importation, but these alternatives were rejected because they could not be implemented in the time frame of the Proposed Project and/or because they would not be cost-effective. It should be emphasized that these alternatives were only rejected as alternatives to the Proposed Project. These alternatives could still be considered for future projects, although separate environmental analysis would need to be conducted. It should also be noted that one of the reasons Phase 3 (construction of new well 36 at Victor and Las Flores) was eliminated was that some of these alternatives may become feasible in the future and could be implemented. Master Response 10 further addresses this comment.

The comment further states that the WSIP would impact his family financially because he is both a rate-payer and a private well owner. One of the project objectives used in selecting the Proposed Project was cost effectiveness. As stated above, many alternatives are too costly to implement at this time. The cost for mitigation provided for changes in water levels from the Proposed Project would be borne by the District.

Letter 16



To: IWVWD Manager Tom Mulvihill
500 W Ridgecrest Blvd
Ridgecrest, CA 93555

Cc: Jon McQuiston
400 N China Lake Blvd
Ridgecrest, CA 93555

RE: Water district expansion 2011 EIR response

Twenty years ago I met with the then general manager of the water district concerning the intent of the water district in preserving and enhancing the valley's aquifer. His statement was, "The Water District is a mining company. We go where the highest quality ore is located and mine that until it runs out and then move to the next highest ore body". It appears that nothing has changed in the past 20 years.

In the several scoping meetings the current general manager of the water district, Mr. Mulvihill, stated that it was the intent of the water district to shift the pumping from the district boundaries to the west valley. The need for this movement towards more appropriation was not addressed in the DEIR. What was addressed was a questionable need to have a tiny safety margin on all capacity with location specific.

The presentation by the Water Districts hydrological consultant, ECORP Consulting, did not provide sufficient rationale for pumping relocation either. The hydrologic presentation, however, shows just the opposite.

First, the water quality within the district's boundary is similar to the west valley quality as shown in Figure 2.8-10 of the DEIR.

Second, the elevation of the water table within the district is rising, whereas the water table in the west valley is declining.

Third, the hydrologic report data (not shown in the DEIR) shows that the rate of decline of the west valley aquifer is higher than the rate of decline in the intermediate zone if pumping was relocated to the West. This contradicts previous district statements of maintaining an 'equality of decline throughout the valley'.

Finally, No rationale exists for the relocation of pumping from within the district boundaries to the west valley based on hydrology. Very little support for the project can be justified on the basis of 'extra capacity' since the emergency inter-tie with other providers exists. Additionally, population forecasts presented in the DEIR show an essentially flat population. Given the state of the Federal Budget, NAWS budget will likely decrease directly reducing staff and water district needs. A flat population with likely decreases in the future will mitigate any slight capacity 'margin' needed by the water district.

16-1

16-2

**WATER SUPPLY IMPROVEMENT PROJECT
FINAL ENVIRONMENTAL IMPACT REPORT**

The plan is a disservice to the customers of the water district since the capital expense will be passed on to the ratepayers in the form of higher water bills with no benefit to the residents of Indian Wells valley..

16-3

In addition, Figure 3.8-2 is obviously incorrect and should either be corrected, justified, or removed from the DEIR. The figure shows an increase in agricultural water use of approximately 2000 AF since year 2000. This increase in water use implies an increase in alfalfa acreage of 440 acres or 800 acres of fruit or nut crops. Satellite imagery of land use does not support this increase.

16-4

Sincerely,

Max Hovaten
Eleanor Hovaten
POB 245
Inyokern,CA 93527

**WATER SUPPLY IMPROVEMENT PROJECT
FINAL ENVIRONMENTAL IMPACT REPORT**

Response to Comment 16-1: This comment states that pumping capacity should not be added to the southwest wellfield, but instead kept within the District boundary. As part of the hydrology modeling process conducted by Layne Christensen in 2010, three primary hydrogeologic criteria were used to identify favorable areas for the construction of new water wells: water quality; aquifer transmissivity; and recent historical changes in water levels. This evaluation showed that the southwest well field area would be an acceptable place to site wells. The 1993 U.S. Bureau of Reclamation report also identified the southwest well field area as an appropriate location for new production wells. Using this information, annual and seasonal changes to water levels were modeled for six pumping scenarios, using various well locations in the central and southwestern portions of the valley. The Status Quo, or No Project, scenario was also modeled. Scenario 6, which included increased pumping at existing wells 18 and 34 and two new wells 35 and 36 was selected as the WSIP because it resulted in the fewest impacts to groundwater levels. This is the project that was initially circulated for scoping in July and August 2011. After comments were received during the scoping process, the WSIP was further revised to eliminate new Well 36, further reducing the impacts to groundwater. Master Responses 2 and 13 provide more information on the hydrology model and the development of the Proposed Project.

Response to Comment 16-2: This comment states that the project is not needed because water can be obtained from other providers and population growth will not occur. Alternative 3, purchase of water from existing Navy wells, is analyzed as an alternative to the Proposed Project in the EIR. The District's Board could choose to adopt this alternative, although the Navy has indicated that adoption of this alternative could take several years with no guarantee of approval and would require the completion of a National Environmental Policy Act document by the Navy. Additional information is provided in Master Response 9.

Population projections of 1 percent annual growth were provided by Kern COG, and are fall within the range of projections used by the City of Ridgecrest in its General Plan (1 to 3 percent) and Kern County in its General Plan (2 percent). It should be noted that the District only produces groundwater in response to actual water demands from its customers. It does not have the ability to store large quantities of water for which there is no demand. If population increases do not occur, or if demand is low because of conservation or cooler weather, then the new facilities would only be operated as needed to satisfy the actual demand. Master Responses 7 and 8 further address this issue.

Response to Comment 16-3: This comment states that the cost of the project will be passed on to IWWWD ratepayers with no benefit. Master Response 11 addresses this issue.

Response to Comment 16-4: This comment states that the increase in agricultural water use since 2000, as shown on Figure 3.8-2 of the Draft EIR is incorrect. The groundwater production information used to create Figure 3.8-2 is from the Indian Wells Valley Cooperative Groundwater Management Working Group. The information is publicly available on the Group's website. This is considered the most accurate source of groundwater production estimates, categorized by individual user groups, that is currently available.

Letter 17

received
12/8/11

Dec. 8, 2011
1559 Weiman Ave.
Ridgecrest, CA
93555

Tom Mulvihill
General Manager
IWV Water District
Ridgecrest, CA 93555

This letter is in regard to the DEIR for the IWV Water District Water Supply Improvement Project. Our comments made earlier for the Initial Study phase are still valid for this project. Increasing pumping capacity to provide more redundancy to meet peak day demands is not needed at this time and would just be another unneeded expense to the rate payers. A much more valuable approach would involve aggressive conservation, water reclamation, and brackish water treatment (desalination).

17-1

Alan L. Woodman
Alan L. Woodman
Joan Woodman
Joan Woodman

**WATER SUPPLY IMPROVEMENT PROJECT
FINAL ENVIRONMENTAL IMPACT REPORT**

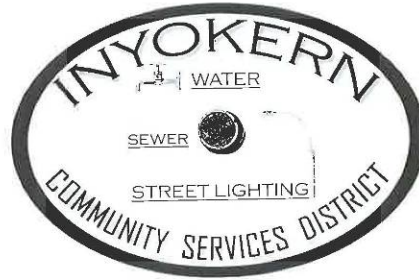
Response to Comment 17-1: This comment states that the WSIP is not needed and would be an unnecessary expense to the ratepayers. The purpose of the Proposed Project is to provide redundancy in capacity in case of a mechanical failure in a well or treatment plant, and also to provide capacity for future population growth of 1 percent per year. Population projections of 1 percent per year were provided by Kern COG, and are fall within the range of projections used by the City of Ridgecrest in its General Plan (1 to 3 percent) and Kern County in its General Plan (2 percent). It should be noted that the District only produces groundwater in response to actual water demands from its customers. It does not have the ability to store large quantities of water for which there is no demand. If population increases do not occur, or if demand is low because of conservation or cooler weather, then the new facilities would only be operated as needed to satisfy the actual demand. Master Responses 7 and 8, and 11 further address this issue.

The comment also states that other alternatives, such as aggressive water conservation, water reclamation, and brackish water treatment should be selected. These alternatives were considered for the Proposed Project, but were rejected because they could not be implemented in the time frame of the Proposed Project and/or because they would not be cost-effective. It should be emphasized that these alternatives were only rejected as alternatives to the Proposed Project. These alternatives could still be considered for future projects, although separate environmental analysis would need to be conducted. It should also be noted that one of the reasons Phase 3 (construction of new well 36 at Victor and Las Flores) was eliminated was that some of these alternatives may become feasible in the future and could be implemented. Master Response 10 further addresses this comment.

WATER SUPPLY IMPROVEMENT PROJECT
FINAL ENVIRONMENTAL IMPACT REPORT

Letter 18

Directors
R. Farris
R. O'Brien
J. Kurley
T. Lyster
W. Ernst



P.O. Box 1418
1429 Broadway
Inyokern, CA 93527

Telephone: (760) 377-4708
FAX: (760) 377-4327

B. Bebee, Manager



November 28th 2011

Board of Directors

Indian Wells Valley Water District

500 W. Ridgecrest Blvd

Ridgecrest, CA 93555

In regards to Draft Environmental Impact Report:

The Inyokern Community Services District (ICSD) provides the following comments to the Indian Wells Valley Water District Water Supply Improvement Project Draft Environmental Impact Report October 2011.

It is unclear to the ICSD if the IWVWD needs the extra capacity. It was stated at the meeting in Inyokern at the Senior Center that there would be no increase to the amount of water pumped, but that the increase in pumping capacity would result in the pumps running for shorter periods of time.

The project states that the proposed project would be generally located West of the City of Ridgecrest, Southeast and East Of Inyokern, and South of NAWS China Lake in Kern County, California. The Draft EIR goes on to say that the proposed project would increase system capacity through the increased pumping capabilities of Wells 18 and 34 in phase one. We are concerned with the increase in pumping capacity in wells that are so close together. If the increase in capacity is deemed necessary would it not be more prudent to increase pumping capacity on wells that are farther apart. The increase in pumping capacity in wells farther apart would minimize the impact on both water level and water quality to any one area.

The proposed well 35 is also in the same general area of the wells 18 and 34. We would have the same concerns about this action. We believe, that if the extra capacity is needed, that steps should be taken to lessen the impact on the water level and water quality to any existing wells in proximity of the proposed project areas.

The ICSD understands that your intent is to meet the capacity needs of your customers, however we are not sure that there is sufficient data indicating that more capacity is needed. Also, if it is found that more capacity is needed, the ICSD would like to see the increased pumping spread out more and not center in on any one area.

Sincerely,

A handwritten signature in blue ink that appears to read "Ron Farris".

Ron Farris

President, Board of Directors

Inyokern Community Services District

18-1

18-2

**WATER SUPPLY IMPROVEMENT PROJECT
FINAL ENVIRONMENTAL IMPACT REPORT**

Response to Comment 18-1: This comment states that it is unclear if the IWWWD needs the extra capacity. As stated in the Draft EIR, Section 2.3, the Proposed Project's purpose is to provide system redundancy to meet maximum day demand with a 20 percent safety factor in the case of a mechanical failure or water quality issue in one or more of their existing wells as required by the 1997 Water General Plan and the 2010 Urban Water Management Plan. Phase 2 of the project would also provide for a modest population increase of 1 percent per year. It should be kept in mind that the District only produces groundwater in response to actual water demands from its customers. It does not have the ability to store large quantities of water for which there is no demand. Should actual demand be lower than the demand predicted in the EIR, from lack of population growth, cooler weather, or other reasons, the new facilities would only be operated as needed to satisfy the actual demand. Master Responses 6 and 7 provide additional information on this issue.

Response to Comment 18-2: This comment states that proposed well 35 is in the same general area as wells 18 and 34, and that the extra capacity should be spread out geographically to lessen the impact on any one area. As stated in the response to Comment 18-1, above, and Master Responses 6 and 7, the Proposed Project would provide the District with additional pumping capacity to meet peak short-term demands in Phase 1, with a minor increase in production quantity in Phase 2 if demand increases in response to the projected one percent increase in population. The wells in the southwest well field are operated approximately 70 to 90 percent of the time during high-demand summer months and 20 to 40 percent of the time during cooler months. The wells are not pumped constantly, but are cycled, which allows the water levels to recover between pumping periods. The worst-case effects of constant pumping of the wells in the southwest well field were identified by the groundwater model, which indicates that effects would not occur at a distance of two miles from the wells. Master Response 1 provides additional information on this issue.

Letter 19

received
12-9-11
[signature]

December 9, 2011

Attention: Indian Wells Water District

As private well owners we would like to state that building more wells is definitely not needed. That would take our supply down.

According to the article in the Daily Independent, Thursday, December 8, 2011, the use of water is down. "Although water rates for Indian Wells Water District customers rose in 2010-11, residential sales decreased, according to figures provided by the Bartle Wells Associates.

Residential sales dropped from \$5.47 million in 2009-10 to slightly more than \$5.284 million in 2010-11."

The official monitoring of our well started on November 10, 2007. It was 318.6 feet. The most recent check was November 4, 2011. The water level was down to 324.8 ft. In 3.9 years our well has lost 6.2 feet. We have no grass or trees. In the last two summers we have had a small garden. We feel that our water supply is being sucked out from under us because the two wells, Well 34 and Well 31, are so close. Well 34 is less than a mile away and Well 31 is approximately a mile and a half. It is apparent to us that our ordinary use of water would not drop our well on a forty acre plot 6.2 feet in such a short period of time.

We also understand that the Water District has committed to the Thermal Project (which is on standby) all the water they want. If the water supply for our property is threatened then the value of the property is also in jeopardy.

E. Eugene Curry
Verna J. Curry
E. Eugene and Verna Curry

4417 W. Ridgecrest Bl.

19-1

19-2

**WATER SUPPLY IMPROVEMENT PROJECT
FINAL ENVIRONMENTAL IMPACT REPORT**

Response to Comment 19-1: This comment states that the Proposed Project is not needed because water use decreased in 2010-2011. Maximum Day Demand for the WSIP evaluated in the EIR was computed by applying a peaking factor to the Average Daily Demand as projected in the 2010 Urban Water Management Plan. This peaking factor was conservative, so that the worst-case scenario could be modeled and evaluated in the EIR. It should also be kept in mind that the District only produces groundwater in response to actual water demands from its customers. It does not have the ability to store large quantities of water for which there is no demand. Should the actual Maximum Day Demand values in the future be less than the estimate, similar to the demand in 2011, the new facilities would only be operated as needed to satisfy the actual demand. Master Response 7 provides more information on this issue.

Response to Comment 19-2: This comment states that the water levels in the commentor's well has dropped because of pumping in the District's wells 31 and 34. The Proposed Project would increase the pumping capacity of Wells 18 and 34. The pumping capacity of Well 31 would remain unchanged. Additionally, the commentor may be within the 2-mile-area of effect for changes in the rate of water level decline from Phase 2 of the Proposed Project. As discussed in Section 3.8.3.3 of the Draft EIR, the Proposed Project would cause water levels at wells within two miles of Well 35 to decline at an increasing rate. The difference between the current baseline rate of decline and the rate of decline that could occur with the Proposed Project is a potentially significant impact. Mitigation has been provided to ensure that existing land uses will be supported in the future. Master Responses 1 through 4 address this issue.

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