



FRIENDS OF THE INYO

SINCE 1986

January 14, 2019

Sent via email to apriln@iwvwd.com

Re: Comments on Draft Groundwater Sustainability Plan for Indian Wells Valley Groundwater Basin

To Whom It May Concern,

On behalf of Friends of the Inyo, we would like to offer the following comments on the Draft Groundwater Sustainability Plan (GSP) for the Indian Wells Valley Groundwater Basin (IWVGB). Unfortunately we will be unable to attend the Indian Wells Valley Groundwater Authority (IWVGA) meeting in person this week, due to predicted severe weather conditions.

Our organization has significant expertise in the environmental importance of groundwater and surface water in the Eastern Sierra. It recently came to our attention that Section 5.3 the Draft GSP proposed for adoption by the IWVGA includes proposed Management Action Project 1 (Develop Imported Water Supply), Option 2 (Groundwater Recharge Project with LADWP). We have very serious concerns about the inclusion of this project and ***strongly urge you to remove Project 1, Option 2 from the Draft GSP*** before it is adopted and submitted to the Department of Water Resources later this month.

Under the concept for Option 2, "Owens Valley water would be recharged into the IWVGB at the spreading grounds and serve as a supplemental source of recharge to replace any groundwater pumping that exceeds the long-term natural recharge to the IWVGB." The Los Angeles Department of Water and Power (LADWP) would provide Owens Valley water to the IWVGA through a new turnout on the LA Aqueduct and a pipeline to convey LADWP's water supply from the Owens Valley to the IWVGB.

The development of a new turnout from the LA Aqueduct and the export of Owens Valley water to a never-before served basin would be a significant and detrimental precedent for the Owens Valley watershed, and would undermine the ongoing need for stringent environmental protections for our precious water resources. Further, it is highly unlikely that the IWVGA can secure the permits, legal authorizations, and environmental approvals that would be required to export water from the Owens Valley to the Indian Wells Valley.

We believe that the proposed project option is infeasible and it therefore does not meet the most basic requirements for inclusion in a GSP. We also do not agree that the IWVGA has met its obligation to

accurately describe the proposed water source, reliability, legal authority, and ability to fund this project option, nor has it adequately considered the collateral impacts to groundwater dependent ecosystems and other natural resources in the basin from which water is proposed to be imported. Friends of the Inyo discourages the IWVGB from expending further efforts to study this project option, as it would be a wasteful use of financial and staff resources. We ask that the IWVGA remove the description of Project Option 2 from its Draft GSP.

A handwritten signature in black ink, reading "Wendy Schneider". The signature is fluid and cursive, with the first name "Wendy" and last name "Schneider" clearly distinguishable.

Wendy Schneider

Executive Director, Friends of the Inyo

cc: Don Zdeba, IWVGA Acting General Manager (don.zdeba@iwwvd.com)

John-Carl Vallejo, Assistant County Counsel, Inyo County (jcvallejo@inyocounty.us)

Matt Kingsley, Inyo County Supervisor