

Directors of the IWVGA; Editor of The News Review; Editor of The Daily Independent
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Cc: Donna Thomas, Adam Bingham

Subject: Planning for Health and Safety

We currently pump groundwater at the rate of about 27,500 afy for *use* as follows:

Navy mission (variable)	1,600
Health and safety at home and work for current population of 35,000	4,100
Irrigation at home, work, farm, and municipal	19,800
Searles Valley Minerals industrial process	<u>2,000</u>
Total	<u>27,500</u>

We must reduce pumping to 7,700 afy to live within recharge as required by state law. The key question is how to allocate this 7,700 afy among the above competing *uses* for groundwater plus reserves for population growth, variable Navy demand, and climate uncertainty?

In answering the question, consider these water code and regulation sections. The code declares that "domestic" use of water has higher priority than "irrigation" use (section 106). The code further declares that "every human being has the right to safe, clean, affordable, and accessible water adequate for human consumption, cooking, and sanitary purposes (section 106.3). Regulations refer to this health and safety provision as the "human right to water" (Reg. section 350.4(g). In potential conflict with the above provisions, the state water code also declares its intent "to preserve the security of water rights to the greatest extent possible consistent with the sustainable management of groundwater" (section 10720.1.(b)).

Here's the rub. The only water that will satisfy the "*affordable*" requirement for health and safety (see above) is natural groundwater recharge. Water imports and paying for water rights transfers are far too expensive to affordably satisfy health and safety needs. Recycled water is not potable. Desalination is not a new source of water and threatens base subsidence. Therefore, please allocate 4,100 afy of natural recharge to health and safety so that all IWV and Trona residents can at least afford to remain here. Thank you.



Nick Panzer



Tom Mulvihill