

COMMENTS ON:
'GROUNDWATER SUSTAINABILITY PLAN SECTION 1 – INTRODUCTION CHAPTER
DRAFT
December 14, 2018'
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January 10, 2019

This document is a good first draft. Specific comments by section are provided below:

Section 1.1 Purpose of the Groundwater Sustainability Plan

The first three paragraphs of this section attempt to summarize the purpose of the GSP, as described in official SGMA documents. This summary is incomplete and repetitive, and may be essentially impossible to execute in several paragraphs. Each constituent group will carefully examine this section to determine if they are adequately represented. I recommend replacing the first three paragraphs with something like:

'The purpose of this Groundwater Sustainability Plan (GSP) is to manage the groundwater in the Indian Wells Valley Groundwater Basin (IWVGB) in accordance with the mandates and regulations that are instituted in the California Sustainable Groundwater Management Act (SGMA) legislation and the regulations and the water code modifications that derive from it. '

The protection of existing water rights is mentioned several times in the first three paragraphs. If any statement about water rights remains in the document, I recommend it be presented in a more balanced light, such as:

'The protection of water rights mandated by SGMA must be balanced against the requirement to manage the IWVGB sustainably, the need to supply water for the health and safety of all residents and businesses, and the human right to water. The investments of all users of water must be considered.'

I recommend that the fifth paragraph, last sentence should read:

'Disadvantaged Communities (DACs), Severely Disadvantaged Communities (SDACs), Economically Distressed Areas (EDAs), mutual / co-op wells, and domestic wells overlying the IWVGB are particularly susceptible to adverse effects resulting from the chronic lowering of groundwater levels because their wells are typically shallow, and furthermore, they often lack the resources to compensate for the continued overdraft.'

Section 1.2 Sustainability Goal

I recommend modifying the first paragraph to be more succinct and to the point. It might read: 'As defined in California Water Code 10721, the 'sustainability goal' is to operate the basin within its sustainable yield (balanced pumping and recharge). The sustainability goal is a quantitative measure; it is a statement of a GSP's objectives and desired conditions and how the basin will eliminate undesired results as defined in SGMA. This goal must be expressed as a quantitative measure of groundwater levels, groundwater quality, and minimum thresholds in groundwater parameters that cannot be

breached, in order to preclude undesirable results. (These terms are defined and described in detail in Section 4).'

Section 1.3 Agency Information

I recommend modifying the second paragraph fourth sentence to read: 'The Indian Wells Valley Water District serves potable water to the city of Ridgecrest and a small area outside of the city of Ridgecrest's jurisdiction. A small number of deep wells service the agriculture in the IWVGB. The vast majority (97%) of wells are shallow and service the rural inhabitants.'

1.4 Notice and Communication

Note that the GSP Annotated Outline provided by DWR shows the 'Notice and Communication' section to be elsewhere in the GSA and to also address 'uses and users'. I recognize that the bulk of this section may be a better match for chapter 1, however the 'uses and users' must be addressed in some appropriate section of the GSP.

I recommend the third sentence of the first paragraph to read: 'The C&E Plan provides specific guidance on public outreach to the GSA on how to alert each stakeholder and agency in the IWVGB to the magnitude of the groundwater overdraft problem, how overdraft will affect stakeholders, and the process for participation in developing a GSP to solve the overdraft problem.'