Lee Sutton
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September 7, 2012

Mr. Richard Booth
Chief, TMDL/Basin Planning Unit
California Regional Water Quality Control Board, Lahontan Region
2501 Lake Tahoe Blvd.
South Lake Tahoe, CA 96150

RE: Proposed Basin Plan Amendment to Remove the MUN Beneficial Use Designation from Salt Wells Valley and Shallow Groundwater in Eastern Indian Wells Valley at NAWS China Lake, California

Dear Mr. Booth:

On behalf of the Naval Air Weapons Station (NAWS) China Lake Restoration Advisory Board (RAB), I would like to take this opportunity to extend our support of the Navy's request for an amendment to the Basin Plan that would remove the Municipal and Domestic Supply (MUN) use designation from the northern portion of the Salt Wells Valley and shallow groundwater in the eastern Indian Wells Valley. The areas proposed for the groundwater exemption to the Basin Plan amendment are provided in the *"Draft Technical Justification for Beneficial Use Changes for Groundwater in Salt Wells Valley and Groundwater in Eastern Wells Valley, Naval Air Weapons Station China Lake, California"* that was prepared for the Navy and dated May 25, 2012.

A subcommittee of 5 out of 8 RAB members reviewed the referenced Technical Justification for the amendment to the Basin Plan. The review subcommittee consisted of representatives for the Indian Wells Valley Water District, Kern County Environmental Health Services Department, Kern County Water Agency, and community members. A committee meeting was held on July 31, 2012 to discuss the contents of the document, with the following conclusions:

- **Salt Wells Valley Water Basin 6-53.** The change of use classification for Salt Wells Valley is so straightforward that there was little discussion. There is not reasonably useable groundwater in the area for contaminants to affect.

- **Indian Wells Valley Water Basin 6-54.** For shallow groundwater in the eastern Indian Wells Valley (known as the Shallow Hydrogeologic Zone or SHZ) the issue is more complex. The rationale for the change is based on the findings of the Basewide Hydrogeologic Characterization Study in 2003 that identified a thick clay layer underlying the SHZ and sealing it off from the regional aquifer. This clay layer extends from the Little Lake fault zone on the west to the bedrock of Lone Butte on the east. The water in the SHZ is of very bad quality and cleaning it to drinking water standards would not be reasonable.

As a result, the NAWS China Lake RAB recommends that the Water Board amends the Water Quality Control Plan for the Lahontan Region to remove the MUN beneficial use designation for groundwater in these areas. Removal of the MUN beneficial use designation is in the Water Board's and community's best interest because it will allow remedial action objectives and groundwater cleanup goals to be based on human health and ecological risk-based objectives, rather than on the current but unattainable Federal and State Maximum Contaminant Levels (MCLs). The RAB recognizes that these proposed changes to the Basin Plan will enable the Navy and Water Board to reconcile differences in groundwater cleanup objectives and expedite cleanup programs at multiple NAWS China Lake Installation Restoration Program sites while reducing the costs for groundwater cleanup.

Sincerely,

Lee Sutton, RAB Community Co-chair

Copy To:

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