



**INDIAN WELLS VALLEY  
COOPERATIVE GROUNDWATER MANAGEMENT GROUP**

Post Office Box 1329  
Ridgecrest, California 93556-1329

September 21, 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 96251

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

Dear Mr. Booth:

I am writing on behalf of the Indian Wells Valley Cooperative Groundwater Management Group (IWVCGMG); a public water data sharing group consisting of most of the major local water producers, government agencies, and other water stakeholders in the valley. The group was formed in 1995 to enable a coordination of resources to collect data, facilitate joint studies, communicate water-related issues through public outreach, and practice responsible stewardship of the water resources in the Indian Wells Valley.

The IWVCGMG wishes to express our support for 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 Salt Wells Valley and from shallow groundwater in the eastern Indian Wells Valley. The areas that would be included under this exemption to the Basin Plan amendment are designated in the document *entitled "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.

The IWVCGMG bases its support on the findings of the Naval Air Weapons Station (NAWS) China Lake Restoration Advisory Board (RAB) and our own Technical Advisory Committee. A subcommittee of the RAB was charged with reviewing the referenced Technical Justification for the amendment and recommended to the full committee during a July 31<sup>st</sup> meeting that the Water Board amend the Water Quality Control Plan for the Lahontan Region to remove the MUN beneficial use designation for groundwater in the two sub-basins; Salt Wells Valley Water Basin 6-53 and Indian Wells Valley Water Basin 6-54.

Removal of the MUN beneficial use designation is in the Water Board's and the community's best interest because it will allow remedial action objectives and groundwater cleanup goals to be based

Indian Wells Cooperative Groundwater Management Group

September 21, 2012

Page 2

on human health and ecological risk-based objectives, rather than on the current but unattainable Federal and State Maximum Contaminant Levels (MCLs). The RAB maintains 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.

Should you have any questions regarding this letter of support, please contact me at (760)384-5555 or you may e-mail me at [don.zdeba@iwvwd.com](mailto:don.zdeba@iwvwd.com).

Regards,



Don Zdeba  
Chair, Indian Wells Valley Cooperative Groundwater Management Group

cc:

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