INDIAN WELLS VALLEY WATER DISTRICT

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By RWB

October 10, 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 Water District (IWVWD), a public agency servicing over 12,000 residential and commercial connections within an approximate 40 square mile area of the Indian Wells Valley.

The IWVWD 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 IWVWD bases its support on the findings of the Naval Air Weapons Station (NAWS) China Lake Restoration Advisory Board (RAB). 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 31st 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 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.

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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.

Regards,

Don Zdeba
General Manager

cc:

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