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May 20, 2020

SUBMITTED VIA DWR SGMA PORTAL  
Mark Norberg, GSA Project Manager  
Sustainable Groundwater Management Section  
California Department of Water Resources  
1416 Ninth Street  
Sacramento, CA 95814

RE: COMMENT LETTER – Groundwater Sustainability Plan for the Indian Wells Valley Groundwater Basin

Dear Mr. Norberg,

On behalf of the Sierra Club's Kern-Kaweah Chapter and the Range of Light Group, Toiyabe Chapter, we are submitting our comments on the Indian Wells Valley Sustainable Groundwater Plan (I WV GSP) that is scheduled for your review on June 3. The Kern-Kaweah Chapter consists of 966 members in Kern County, home to the Indian Wells Valley. The Range of Light Group is part of the Toiyabe Chapter of the Sierra Club and consists of over 400 Sierra Club members in Inyo and Mono Counties that potentially will be impacted. Sierra Club California works to protect all California watersheds, especially in the Sacramento-Bay Delta (San Francisco Watershed) and the Eastern Sierra (Lahontan Watershed). Surface water and groundwater shape the terrestrial and aquatic environments in these areas. These watersheds have been heavily impacted by water exports already and will be further impacted if additional water is exported from them.

### **I WV GSP Project 1, Option 1**

We have serious concerns about Option 1 in the I WV GSP that proposes to buy water from the State Water Project through the Antelope Valley East Kern Water Agency to recharge the I WV basin. The State Water Project is already over allocated and will have declining water resources over time due to declining snowpack as a result of climate change. More importantly, less water has been flowing through the Sacramento Delta and into the Bay because of increased diversions and declining water resources from the Sacramento and San Joaquin Rivers over the past several decades. This has severely impacted California's anadromous fisheries and wetlands in the delta. Additional exports would reduce the amount of water flowing through the Sacramento Delta even more. The numerous harms to the delta environment are documented in a comment letter Sierra Club California submitted to the Department of Water Resources on April 14, 2020 in response to the Environmental Impact Report for the Delta Conveyance Project ([http://www.sequoiaforestkeeper.org/pdfs/comment\\_letters/Water/20200414\\_FINAL\\_SCC\\_Comments\\_DWR\\_NOP\\_EIR\\_for\\_Delta.pdf](http://www.sequoiaforestkeeper.org/pdfs/comment_letters/Water/20200414_FINAL_SCC_Comments_DWR_NOP_EIR_for_Delta.pdf)). Also, on April 29, 2020, The Sierra Club and other organizations filed a writ of mandate and declaratory and injunctive relief in the Superior Court of The State of California regarding the Delta Conveyance Project, directing the California Department of Water Resources ("DWR") to vacate its approval of the Long-Term Operation of the State Water Project ("SWP" or "Project"), the Findings, and the March 27, 2020 certification of the Final



Environmental Impact Report (“EIR”) for the Project, and to revise its Findings to conform with the law. (See <https://www.courthousenews.com/wp-content/uploads/2020/04/CalifStateWaterProject-COMPLAINT.pdf>) On May 11, 2020 a district judge ordered the federal government to reinstate stricter pumping limits.

To add another recipient of state water solves nothing and heightens conflicts over water even more. The current water users keep asking for more, especially the farmers in the San Joaquin Valley. In February 2019, the Public Policy Institute of California published a report titled, “Water and the Future of the San Joaquin Valley”, which forecasts the need to fallow or retire approximately 500,000 to 750,000 acres of productive farmland to address the existing groundwater overdraft and water supply deficit in the San Joaquin Valley. All the overdrawn aquifers will need much more water from the State Water Project to continue operations *and* recharge the aquifer to achieve sustainability. Unfortunately, there isn’t enough state water to bail out all the over drawn aquifers in the state.

### **IWV GSP Project 1, Option 2**

We oppose Option 2 in the IWV GSP that proposes to buy water from Los Angeles Department of Water and Power (LADWP) to recharge the Indian Wells Valley groundwater basin. With climate change forecasted to reduce snowpack in the Sierra, the Eastern Sierra water resources stand to be severely impacted. Water resources will be shrinking while local and Los Angeles water needs will be growing. We have already seen surface vegetation die and springs dry up from the groundwater pumping in the Owens Valley. We have already observed wetlands dry up and wildlife decline from the current exports from the Mono Basin and Long Valley. There is no “extra water” in the Eastern Sierra.

Increasing exports from the Eastern Sierra will increase the pressure to pump more groundwater in the Owens Valley and to start mining it in Mono County. In 2018 LADWP issued a Notice of Preparation for an EIR to provide waterless leases to the ranchers in Mono County who lease from them. LADWP explained they needed to increase exports from Mono County to Los Angeles in light of climate change ([http://www.sequoiaforestkeeper.org/pdfs/comment\\_letters/Water/2018\\_Jul\\_9-LADWP-BOLTON\\_RE\\_free\\_ranching\\_water\\_CCF07052020.pdf](http://www.sequoiaforestkeeper.org/pdfs/comment_letters/Water/2018_Jul_9-LADWP-BOLTON_RE_free_ranching_water_CCF07052020.pdf)). Currently LADWP only exports surface water from Mono County. They export both surface and groundwater from Inyo County. Groundwater exports started with the completion of the second barrel of the LA Aqueduct. In fact, LADWP has recently been conducting pump tests in an area north of Bishop where they want to tap the deep aquifer in the future. Groundwater pumping for export could not only dry up the aquifer, but also cause land subsidence, which damages infrastructure. In the San Joaquin Valley subsidence has damaged State and Federal Water Project canals and aqueducts.

Although IWVGA proposes to pay LADWP at Metropolitan Water District (MWD) rates for the water they send to Indian Wells Valley, it only adds a financial incentive for LADWP to buy less from MWD and to take more from the Eastern Sierra. Option 2 could have a devastating effect on the Eastern Sierra environment and local economy.

### **IWV GSP Sustainable Options**



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The IWV GSP commits to measures to conserve water, to optimize the existing wastewater treatment plants, and to fallow fields. These are good actions to take, but insufficient to recharge the aquifer, which is why the plan proposes importing water. According to the IWV GPS 50% of groundwater in the Indian Wells Valley goes to agriculture: primarily growing alfalfa and pistachio trees. Water used for agriculture sustains the crops or evaporates. It can't be captured and therefore can't be recycled. It needs a constant new supply of water. With small population centers, there isn't enough treated wastewater generated to recycle back into domestic use or to use for landscaping. Possible solutions: IWVWD could buy treated wastewater from a large metropolis, conserve more domestic and industrial water, and/or reduce the current level of agriculture in Indian Wells Valley. Whatever the solutions, importing dwindling supplies of fresh water from the Eastern Sierra or the State Water Project should not be one of the options.

The GSP estimates 6,000-8,065 AFY would need to be imported, but there is no hard and fast limit on how much water the IWV water district will need to buy to maintain current water uses. Water purchases will have to increase over time due to population growth and the current mix of agriculture that includes permanent-crops, which cannot be fallowed during drought cycles. Starting in 2010, 1,600 acres of young permanent-crop pistachio trees were planted that will need even more water as they mature. It was predictable that water-intensive agriculture in a desert, with only groundwater as the sole source of water, would not be sustainable.

### **Aqueduct Infrastructure**

The conflict over the uses of limited water supplies is only part of the picture. Building an aqueduct across 50 miles of precious desert land is another. With either option, the aqueduct would go through Areas of Critical Environmental Concern under the Desert Renewable Energy Conservation Plan and the National Conservation Lands Act protecting Mojave Ground Squirrel and Desert Tortoise habitat. Deserts with slow growing plants take decades to recover from ground disturbances.

Please do not approve this plan until Option 2, to import water from LADWP, is eliminated and Option 1 is offset by an equal reduction in water from another water buyer. The State Water Project provides a limited source of water and needs to be managed more sustainably. A sustainable, groundwater plan for one basin should not adversely impact the groundwater sustainability of another basin or harm their ecosystems or the ecosystems of the global environment. The whole point to the Groundwater Sustainability Act is for communities to live sustainably within their environment for generations to come.

Sincerely,



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Range of Light Group .Toiyabe Chapter



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