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**COUNTY OF INYO
WATER DEPARTMENT**

November 18, 2010

TO: Mary Scruggs, Department of Water Resources

FROM: Bob Harrington, Inyo County Water Director

SUBJECT: Comments on draft CASGEM Monitoring Entity Reporting and Groundwater Monitoring Guidelines

Thank you for the opportunity to comment on draft CASGEM Monitoring Entity Reporting and Groundwater Monitoring Guidelines. Please feel free to contact me for any clarifications or further discussion.

1. The process for reporting data is not described in enough detail for prospective monitoring entities to evaluate the level of effort and resources that will be required to implement monitoring programs.
2. The monitoring entity guidelines need to describe how the basin prioritization process (Section 10933) will be used in the CASGEM program. There are numerous basins in Inyo County that are largely federally owned, undeveloped, uninhabited, and undevelopable under current land management directives. Even if the County had resources and permission to monitor these basins, it would be a waste of resources. The majority of these basins are in Death Valley National Park or China Lake Naval Weapons Center, and because of their status as federal military reserves or designated wilderness, they will not be subject to future groundwater development, nor can monitoring wells be constructed. These basins are listed in Table 1. The lack of information and absence of groundwater development in these basins is documented in CDWR Bulletin 118. The monitoring entity procedures should recognize that some basins are low priority and/or impossible to monitor.
3. A large number of groundwater basins in Inyo County are under state or federal land management (Table 1). Inyo County does not have jurisdiction to conduct monitoring activities on state or federal land, and federal and state agencies are not identified in Section 10927 as eligible monitoring entities. The guidelines do not provide any guidance as to how monitoring

entities should address basins where ownership and land management do not allow for monitoring to occur. We are proceeding under the assumption that the only entity identified in Section 10927 that could possibly be a monitoring entity on state and federal lands would be a cooperative groundwater monitoring association formed to include the relevant state or federal agency. The monitoring entity procedures should clarify how to go about identifying a monitoring entity for land where none of the entities identified in Section 10927 have jurisdiction to conduct monitoring.

4. The amount of time available for prospective monitoring entities to coordinate with other local entities is insufficient for us to identify monitoring entities for all basins within Inyo County. In the majority of the basins within Inyo County, it appears to us that the only way the County could assume monitoring responsibilities would be through development of cooperative groundwater monitoring associations with various state and federal agencies, and we have not been afforded enough time to develop such agreements.

5. As described in SBX7_6, the purpose of CASGEM is to determine seasonal and long-term trends in groundwater elevations. The draft Procedures for Monitoring Entity Reporting and draft Groundwater Elevation Monitoring Guidelines both refer to groundwater elevation contouring. The amount of groundwater elevation data required and the rigor of monitoring network design are far higher for contouring than for simply characterizing trends. For example, in Owens Valley, where Inyo County's most intensive groundwater development has occurred, we characterize overall trends with a network of 30-40 wells, whereas we use 300-400 wells for contouring shallow groundwater elevation. The procedures and guidelines should not require that monitoring programs be aimed at producing groundwater elevation contour maps; rather, the programs should be aimed at characterizing seasonal and long-term trends. The more modest purpose of characterizing trends is more consistent with the language SBX7_6, and imposes much less burden on monitoring entities. Both the procedures and the guidelines should change to reflect that the purpose of the monitoring is to characterize trends, not produce contour groundwater elevation maps.

Table 1. Groundwater basins in Inyo County that cannot be monitored due to lack of monitoring wells, land use designations incompatible with monitoring, or have no significant groundwater development. BLM=Bureau of Land Management, DOI=Department of Interior, DVNP=Death Valley National Park, DOD=Department of Defense, CLNWC=China Lake Naval Weapons Center, SLC=State Lands Commission.

Bulletin 118 basin number	Basin name	Ownership	Comments
6-13	Black Springs Valley	BLM, SLC, negligible private property	One BLM monitoring well, no groundwater development, uninhabited
6-14	Fish Lake Valley	Mostly BLM, some private agricultural parcels	May merit monitoring due to agricultural pumping
6-15	Deep Springs Valley	Mostly BLM and SLC; several parcels owned by private college	Uninhabited except for Deep Springs College
6-16	Eureka Valley	BLM, SLC, DOI(DVNP), a few mining claims	Uninhabited federal land, no groundwater development, mostly wilderness. One dry well known.
6-17	Saline Valley	DOI(DVNP) and SLC, one private inholding, a few mining claims	Uninhabited federal land, no groundwater development, mostly wilderness
6-19	Wingate Valley	DOI(DVNP) and SLC	Uninhabited federal land, no groundwater development, mostly wilderness, no known wells
6-55	Coso Valley	DOD(CLNWC)	Undeveloped, uninhabited basin on publicly inaccessible military reserve (weapons testing range – unexploded ordnance hazard throughout)
6-61	Cameo Area	DOI(DVNP)	Uninhabited inaccessible wilderness, no groundwater development
6-62	Racetrack Valley	DOI(DVNP)	Uninhabited federal land, mostly wilderness, no groundwater development, no wells known
6-63	Hidden Valley	DOI(DVNP)	Uninhabited federal land, mostly wilderness, no groundwater development, no wells known
6-64	Marble Canyon Area	DOI(DVNP)	Uninhabited federal land, mostly wilderness, no groundwater development, no wells known
6-65	Cottonwood Spring Area	DOI(DVNP)	Uninhabited federal land, mostly wilderness, no groundwater development, no wells known
6-66	Lee Flat	DOI(DVNP) with minor BLM	Uninhabited federal land, no groundwater development, BLM staff indicates one well
6-67	Santa Rosa Flat	BLM with minor DOI(DVNP)	Uninhabited federal land, no groundwater development, no known wells
6-70	Cactus Flat	BLM, SLC	Uninhabited state and federal land, no groundwater development, no known

Bulletin 118 basin number	Basin name	Ownership	Comments
			wells
6-72	Coles Flat	DOD(CLNWC)	Uninhabited federal land, no public access, no groundwater development (weapons testing range - unexploded ordnance hazard throughout)
6-73	Wildhorse Mesa	DOD(CLNWC)	Uninhabited federal land, no public access, no groundwater development (weapons testing range - unexploded ordnance hazard throughout)
6-74	Harrisburg Flats	DOI(DVNP)	Uninhabited federal land, no groundwater development, no known wells
6-75	Wildrose Canyon	DOI(DVNP)	Uninhabited federal land, no groundwater development, no known wells
6-79	California Valley	BLM and SLC	Uninhabited federal land, but may merit monitoring pending development of adjacent Pahrump Valley.
6-80	Middle Park Canyon Valley	DOI(DVNP)	Uninhabited federal land, no groundwater development, wilderness, no known wells
6-81	Butte Valley	DOI(DVNP)	Uninhabited federal land, no groundwater development, mostly wilderness, no known wells
6-82	Spring Canyon Valley	DOI(DVNP)	Uninhabited federal land, no groundwater development, wilderness, no known wells
6-84	Greenwater Valley	DOI(DVNP) and SLC	Uninhabited federal land, no groundwater development, mostly wilderness, no known wells
6-85	Gold Valley	DOI(DVNP)	Uninhabited federal land, no groundwater development, mostly wilderness, no known wells
6-86	Rhodes Hill Area	DOI(DVNP)	Uninhabited federal land, no groundwater development, mostly wilderness, no known wells