



October 10, 2013

Mr. Keith Wallace
California Department of Water Resources
Division of Integrated Regional Water Management
Financial Assistance Branch
PO Box 942836
Sacramento, CA 94236

Re: Proposition 84 Round 2 Implementation Grant Inyo-Mono IRWM Program Application Evaluation

Dear Mr. Wallace:

Enclosed in this letter, please find responses to the DWR evaluation of the Inyo-Mono IRWM Program application for the Round 2 Implementation grant, and more specifically, of the Amargosa Basin Groundwater Studies Project.

Budget

The evaluation states that several of the project budgets were lacking supporting documentation. For the Amargosa Basin project, hourly rates for U.S. Geological Survey personnel were unavailable at the time of grant application preparation. U.S. Geological Survey labor rates can be expected to be slightly higher than non-U.S. Geological Labor.

Technical Justification

The comments regarding technical justification with respect to Project 3 (although not mentioned specifically) are puzzling. The Work Plan and attached State of the Basin Report provides exhaustive technical justification for the work proposed. In fact, the State of the Basin Report has each of the proposed work items in the Work Plan as recommendations to address data needs for a cogent understanding of the Amargosa Basin's conceptual model. It appears that DWR staff did not fully review the information provided.

Benefit and Cost Analysis

Much the same can be said of the Benefit and Cost Analysis section as related to Project 3. For example, specific actions that will be taken will be to incorporate the newly acquired data into

the Wild & Scenic Amargosa River Management Plan and installed monitoring wells will provide Inyo County compliance with the CASGEM program promulgated by the State of California. The Work Plan is quite specific on those issues.

Monitoring, Assessment, and Performance Measures

The final comment from DWR is that *“Finally, project 3’s goals and objectives listed in the work plan do not match the goals and outcomes in Attachment 6.”* The goals in the Work Plan and in Attachment 6 are completely consistent. The Objectives in the work plan are correctly different than the outcomes in Attachment 6 because objectives are very different from outcomes. There is much confusion among technical professionals about outcomes and objectives, and there are many who feel that both are same to be used interchangeably. However, objectives are not the same as outcomes. In most instances, objectives are outlined in conceptual terms of the issues that the work intends to address or improve (for example protecting water supply or quality), while outcomes are defined in terms of what specific, tangible performance measures or products that will result (such as an improved water management plan, compliance with CASGEM, etc.). Given these differences, the text in both the Work Plan and Attachment 6 are wholly consistent with what was asked to be presented in the grant application.

Increasing pressures on the region’s water resources are well-documented (e.g., groundwater export projects, renewable energy projects). The identification of baseline hydrologic conditions before substantial impacts start occurring is essential for future water management in the Amargosa Basin, including how such pressures could impact the very disadvantaged communities of the Shoshone-Tecopa area. It is also essential that hydrogeologic characterization of the portion of the Mojave Desert described in their proposal take place in order to make informed land management decisions and associated recommendations. Identifying measured spring conditions such as flow is critical. In the California desert, relying on visually recognizing changes in flow, while important, can indicate impacts to vegetation and wildlife that have already occurred and may be irreversible. By relying solely on indications of vegetation stress, this is even truer. As part of this effort, the preparation of a baseline report will be critical toward the development of a longer-term periodic monitoring effort to identify potential impacts to springs before irreversible impacts from future groundwater development occur, causing economic hardship in a very disadvantaged region.

We encourage DWR to reconsider its evaluation of this important project.

Most Sincerely,

Best,



Jordan Kelley