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Environmental Research and Education

Response to draft report IWVGA (draft) Section 2 Plan Area

I am resending my Section 2 comments because they were not addressed in the draft IWVGA (Nov 4, 2019)

1) Sec 2.5.2.4 The city of Ridgecrest does not state its major objective such as: (mitigate the overdraft)(save water for grand kids)? The paragraph says nothing relative to how the city encourages water conservation via its land use jurisdiction. The paragraph should specifically identify the City's land use ordinances and state the impact of those ordinances on resource conservation. The paragraph should specifically state how each zoning ordinance promotes water conservation and discourages wasteful use of water.

2) Sec 2.7.3 Does nothing to define a performance measure relative to conservation or conservation goal. How are you to measure progress? Can any of the programs mentioned be quantified? If so how? One performance measure in addition to absolute water production could be the ratio of indoor water use to outdoor water use. The Navy and Ridgecrest generate about 2,500 acre-feet of effluent (sewage). The ratio is about Navy 28% vs. City 72%. The Navy uses about as much water outdoors as indoors. The City uses almost three times as much water outdoors as indoors. The City outdoor use of water seems high. What would be a reasonable goal? What conservation program in Sec 2.7.3 is going to address these issues?

3) Sec 2.7.3.4 statement regarding tiered rates motivating water conservation is misleading. Impacts of IWVWD fees on conservation, overall fee structure, fixed and actual fee must be analyzed. Fixed fees generate about 60% of the revenue while the water fees generate about 40%. This ratio establishes a low average unit water fee. A low average water fee encourages water waste.

The water fee structure contains 4 tiers. Tier 1 contains 9 units of water. Tier 2 contains 15 units of water. Tier 1 and 2 comprises about 75% of water sold. Tiers 3 and 4 comprise the remaining 25%. Both Tiers 1 and 2 water sells for less than the average unit water fee. That means Tiers 3 and 4 subsidize Tiers 1 and 2.

Tier 1, the first 9 units, is for health and safety use. Tier 2, the next 15 units is for outdoor landscape use. While Tier 1 water is obviously a necessity, Tiers 2,3,and 4 are all discretionary water use. Notice however, that Tier 2 is being subsidized. The subsidized 15 units in Tier 2 do not promote water conservation.

The combination of a low average water fee combined with a very large and subsidized Tier 2 loophole, encourages water usage, not water conservation. Due to these noted issues, the draft plan is inadequate.

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