



CALIFORNIA FARM BUREAU FEDERATION

LEGAL SERVICES DIVISION

2600 RIVER PLAZA DRIVE, SACRAMENTO, CA 95833 • PHONE (916) 561-5665



December 2, 2020

Via E-Mail (apriln@iwwvd.com)

Board of Directors
Indian Wells Valley Groundwater Authority
c/o April Keigwin, Clerk of the Board
500 W. Ridgecrest Blvd.
Ridgecrest, CA 93555

Re: IWVGA Extraction and Replenishment Fees – Request for Postponement

To the Members of the IWVGA Board of Directors:

The undersigned organizations have previously written to you, by letter of October 14, 2020, to express serious reservations about the sufficiency and effectiveness of the draft groundwater sustainability plan (“draft GSP”) that IWVGA has submitted to the Department of Water Resources (“DWR”) for review and approval, and to request its revision.

We write now in support of the request you have received from Mojave Pistachios to postpone the effective date for imposing and collecting the proposed extraction and replenishment fees.

As we previously expressed, the fees – which are proposed for as much as \$2,130 per acre foot – are extraordinary, and likely to put much of agriculture within the basin out of business. Given that DWR has yet to approve the plan as contemplated by the Sustainable Groundwater Management Act (“SGMA”), as well as pending legal challenges within the basin, we believe that the fee structure is premature at best.



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Please add this request to the agenda for next week's board meeting – we thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Gail Delihant". The signature is written in a cursive, flowing style.

Gail Delihant
Sr. Director, CA Government Affairs
Western Growers Association

A handwritten signature in black ink that reads "Christian C. Scheuring". The signature is written in a cursive, flowing style.

Christian C. Scheuring
Managing Counsel
California Farm Bureau Federation

CCS/bzc