

INDIAN WELLS VALLEY WATER DISTRICT

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DOCKET

09-AFC-9

DATE	MAY 19 2010
RECD.	JUL 28 2010

Thomas F. Mulvihill
General Manager
Krieger & Stewart, Incorporated
Engineers
McMurtrey, Hartsock & Worth
Attorneys-at-Law

May 19, 2010

State of California
California Energy Commission
Siting, Transmission & Environmental Protection Division
Attn: Mr. Eric K. Solorio, Project Manager
1516 Ninth Street, MS 15
Sacramento, CA 95814-5512

RE: IWVWD RESPONSE TO STAFF ASSESSMENT AND DRAFT ENVIRONMENTAL IMPACT STATEMENT AND DRAFT CALIFORNIA DESERT CONSERVATION AREA PLAN AMENDMENT – RIDGECREST SOLAR POWER PROJECT – APPLICATION FOR CERTIFICATION (09-AFC-9) KERN COUNTY

Dear Mr. Solorio,

The District makes the following comments:

Xeriscaping of Residential Landscapes C.9-30

The EIS states, "...The project would offer financial incentives to the property owners within the City to convert their landscape."

The District proposes that the financial incentives for landscape conversion be offered throughout the Indian Wells Valley.

Land Fallowing Program C.9-30

The EIS states, "...Water use would be monitored on a monthly and annual basis by the IWVWD to ensure that the annual water use by the grower does not exceed the negotiated water offset amount."

The District proposes that water use would be monitored on an annual basis to ensure that the annual water use by the grower does not exceed the negotiated water offset amount. The reason for this is the seasonality of the water usage making only annual comparisons valid.

Prepare and Implement a Water Conservation Offset Program C.9-70

The EIS states, "The monitoring plan shall monitor the effectiveness of the program on a monthly basis, summarized annually and included with the annual compliance report." (Soil & Water – 3B)

The District proposes to monitor the effectiveness of the program on an annual basis because of the seasonality of consumption and the base target savings goal 56 gallons per square foot is an annual number.

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Prepare and Implement a Water Conservation Offset Program C.9-71

The EIS states, "The water conservation offset shall be demonstrated as an annual average over a running 3 years for the life of the project."

The District proposes an annual average of a running 3 years until 313,000 square feet have been converted and included in the 3 year average. The District believes that this plan for monitoring will achieve an adequate confidence level.

**SOIL AND WATER, APPENDIX B
PLAN FOR OFFSETTING PROPOSED CONSTRUCTION AND OPERATIONAL WATER SUPPLY**

4.2 Xeriscaping of Residential Landscapes

The EIS states, "Residents would agree to install a sub-meter that monitored irrigation consumption on the xeric landscape only. Sub-meters would be read monthly, as with main water meters."

The District proposes to compare pre-conversion to post-conversion water consumption for the applicant. This would be done from the existing meters. There would not be an installation of a sub-meter. One reason being that there is no base data for the area measured by the sub-meter.

The EIS states, "...monitoring be conducted for a period of five years to ensure that the annualized water savings continues to exceed the required offset."

The District proposes monitoring to be conducted for a running 3-year period once 313,000 square feet of turf have been converted.

The EIS states, "...if the xeriscape was removed the costs for installation, monitoring and administration up to the date of removal be levied to the property owner."

The District proposes that if the xeriscape is removed within 10 years of the conversion, the property must refund the District the full amount of the incentive payment. The District believes that it will be a rare occurrence that xeriscape will be removed. This would indicate a lesser degree of monitoring.

4.3 Agricultural Fallowing

The EIS states, "...in that water use would be monitored on a monthly and annual basis by the IWV Water District to ensure that the annual water use by the grower does not exceed the negotiated water offset amount."

The District proposes the annual water use by the grower is monitored on an annual basis by the IWV Water District for the reasons already cited.

Thank you,



Tom Mulvihill
General Manager

TM/pm

C: Board of Directors