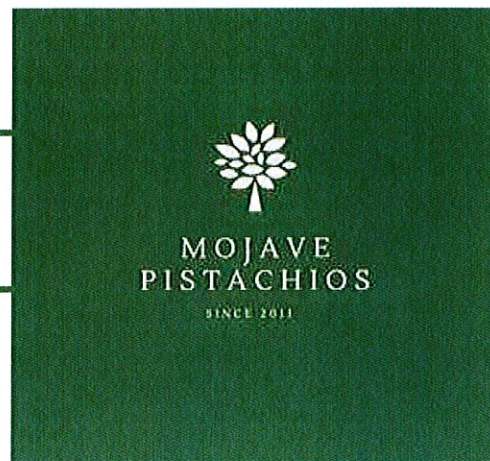


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# MOJAVE PISTACHIOS

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November 18, 2020

Via Email (apriln@iwwvd.com)

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

Subj: IWVGA Extraction and Replenishment Fees  
Re: Postponement

To the Members of the IWVGA Board of Directors:

We respectfully request that the IWVGA postpone the effective date for imposing and collecting its extraction and replenishment fees until the California Department of Water Resources has approved the Groundwater Sustainability Plan (GSP) for the Indian Wells Valley Groundwater Basin.

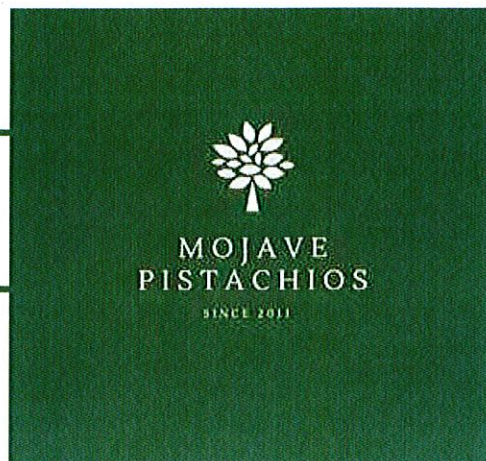
We base this request on the following facts:

- The IWVGA has not identified a single undesirable result under Water Code Section 10721(x)(1)-(6) that will occur within the next 24 months by the continued rate of groundwater extraction;
- The combined extraction and replenishment fees are the highest ever levied on the production of groundwater in the history of California;
- Existing users and going concerns will not be able to pay these fees and avoid bankruptcy;

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# MOJAVE PISTACHIOS

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- The fees will result in great economic and financial hardship in a time where there will be further governmental shutdowns due to COVID-19; and
- The collection of the fees will not support the acquisition of supplemental water because the GSP is subject to regulatory approval and two lawsuits challenging its legitimacy. Therefore, underwriting of the financial commitments necessary to acquire supplemental water is presently infeasible.

We ask that the IWVGA add this request to the agenda for the upcoming December 2020 Board meeting.

Sincerely,

  
Paul Nugent

Mojave Pistachios

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