

## A CLOSER LOOK AT BMP 11

Throughout California over the past month or so, the media has given substantial coverage to the California Urban Water Conservation Council (CUWCC) and Best Management Practice (BMP) 11, designated by the title “Rates.”

The Indian Wells Valley Water District Board examined the content and methodology of BMP 11 extensively before deciding to vote against its implementation at its June meeting. I thought it might be an appropriate time to take a closer look at the CUWCC and the development of BMP 11 to give our customers a better understanding of the District’s position on this matter.

The stated purpose of the CUWCC is to identify and investigate strategies to render long-term water management more efficient. To do this, the Council, established in 1991, sought to create partnerships with agencies throughout California who were connected to water in some way.

Now encompassing 384 members, the Council has spent the ensuing years drafting what they call Best Management Practices designed to be integrated into the future development and management of the state’s water resources. It should be noted that these measures come with the heading “Urban” for a reason.

According to Wikipedia’s on-line dictionary, an urban area is one “with an increased **density** of human-created structures in comparison to the areas surrounding it. This term is at one end of the spectrum of **suburban** and **rural** areas. An urban area is more frequently called a **city** or **town**.”

The District serves customers both urban (within the City of Ridgecrest) and rural (outside the city limits and often characterized by parcels of 2.5 acres or more). And because of the real differences between and among water agencies of various sizes and populations, the CUWCC states on its Web site that “a single implementation method for a BMP would not be appropriate for all water suppliers. In fact, it is likely that as the process moves forward, water suppliers will find new implementation methods even more effective than those described. ”

The CUWCC also allows for the exemption of a BMP (there are 14 in all) by a member under certain specific circumstances, which are spelled out in their Memorandum of Understanding. The Council was aware that some kinds of conservation methods, like rebates for Energy Star/water thrifty washing machines for example, might not be financially feasible for smaller or more rural water suppliers.

At the outset, BMP 11 was supposed to address urban landscape irrigation practices. However, the ultimate version included all signatory water suppliers, whether urban or rural and without regard for either population density or the purpose of the water usage. That is to say, indoor water usage wound up being a part of the final package. The

Council has not explained why it abandoned the urban landscape study it was originally assigned.

Basically, BMP 11 directs water suppliers to shift 70 percent of all revenues to usage charges, a practice known as “volumetric pricing.” In a nutshell, the more customers use, the more they pay. The CUWCC believes this will provide a greater incentive for reducing average or peak use.

Our customer’s monthly bill is composed of a fixed charge and a volumetric charge. This rate structure was developed through a cost of service study and designed to reflect the District’s actual costs. The revenue from fixed charges was set by examining those costs that do not vary with the amount of water used. The costs that do vary with the amount of water used are covered by our “volumetric” portion of your bill. Therefore, the split between the District’s fixed and volumetric charges was determined specifically by our unique set-up.

In 2004, AB 2717 mandated that the CUWCC make recommendations for improving urban water efficiency in new and existing urban landscapes. The Council responded with the much more far reaching revision of BMP 11, described above. In 2006, our legislators passed, and the Governor signed, AB 1881. This measure requires an updated state water conservation ordinance, based on BMP 11, to be enacted by January of 2009. No one can predict how much of BMP 11 will be included in the law but we do know that all water agencies will have to abide by that law as of January, 2010. *Unless those agencies already have an ordinance in place that is considered at least as effective as the state version.*

The IWWWD and Ridgecrest city representatives are hard at work on new water conserving landscape ordinance. We believe our locally elected officials have a clearer understanding of the wants and needs of this Valley than anyone serving in Sacramento, no matter how well intentioned. That is why our Board voted against supporting BMP 11. If adopted exactly as it now reads, it will give control of our basic rate structure to the state government of California