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Jessica Pearson  
Executive Officer  
Delta Stewardship Council  
980 Ninth Street, Suite 1500  
Sacramento, CA 95814  
Transmitted via email  
[pmcomments@deltacouncil.ca.gov](mailto:pmcomments@deltacouncil.ca.gov)

Re: Proposed Delta Plan Performance Measures

Dear Ms. Pearson:

On behalf of the Mojave Water Agency, thank you for the opportunity to comment on the proposed Performance Measures to be used by the Delta Stewardship Council to assess progress on implementing the Delta Plan. As one of the inland public water agencies serving California's diverse population, we are committed to the coequal goals of providing a more reliable water supply for California and protecting, restoring, and enhancing the Delta ecosystem. We believe this can best be achieved by performance measures that encourage development of diverse, creative water portfolios that make efficient use of available resources, water purchases, and regional recharge and reclamation projects.

### **Consideration for Investment and Forward Water Purchases**

The Mojave Water Agency serves a 4,900 square mile area in the arid Mojave Desert. Currently the Agency is developing its Urban Water Management Plan. Growth projections for the MWA service area, developed by Beacon Economics, demonstrate steady, robust growth from a current population of 450,000 to nearly 600,000 by 2030, and more than 800,000 by 2060. As a responsible State Water Contractor, our Agency has invested in both infrastructure projects such as key recharge facilities and pipelines, aggressive conservation programs, and has made investments in forward purchases of Table A water to meet these future needs. The way the Performance Measures reads implies a local or regional look at reducing exports from the Delta by reducing the volume of water taken.

Defining "Reduced Reliance" as simply taking less water from the Delta is not adequate in the broader context of the Delta Reform Act, is in opposition to the coequal goal of improving California's water supply reliability, and ignores a more strategic approach to managing Delta water resources. Reduced Reliance policies should recognize that the Bay Delta Conservation Plan is largely intended to *improve* Delta water supply reliability, not reduce it. Reduced Reliance should not simply mean reducing exports, but should mean agencies will manage their use of Delta water supplies more responsibly by capturing supplies when they are available in wetter years and being prepared for times when Delta water supplies are reduced or unavailable due to droughts, outages, or other times when Delta supplies are inadequate to meet normal demands. Statewide, regional, and local efforts to Reduce Reliance can include expanding surface storage and groundwater conjunctive use programs, development of

local and regional supplies(e.g., water recycling, stormwater capture, brackish and seawater desalination), expanding options for water transfers, plus water use efficiency and conservation improvements as required by SB 7xx.

MWA supports the Legislature's policy of Reducing Reliance on the Delta. With improved conveyance, ecosystem restoration, and reductions in the "stressors" that harm Delta species, we believe it is feasible to achieve the mandated co-equal goals to restore both water supply reliability and the Delta ecosystem, without reducing exports. We have reduced our use of Delta water on a per-capita basis by aggressively pursuing water use efficiency. Over the last 10 years, per-capita water use within MWA's service area has dropped approximately 34%, although our population has grown by approximately 40%. Over the last seven years the region has removed nearly 9 million square feet of turf through MWA's Cash-for-Grass program. The demand projections included in our Urban Water Management Plan assume even more reductions in per-capita water use will occur in the future, but we will not be able to reduce our percentage or volume of Delta water supplies as we meet projected water needs in the next 10 to 30 years. We have also employed a robust groundwater conjunctive use program, through which we have banked enough State Project Water to withstand a "worst-case" 6-year drought affecting the Delta or a 3-year complete outage on the SWP. **We ask that the Delta Stewardship Counsel (DSC) consider these types of practices as valid means to Reduce Reliance on the Delta without placing exclusive policy focus on reducing net exports from the Delta.**

#### **"Reduced Reliance and Improved Regional Self Reliance" Language**

Moreover, MWA requests changes to the language that outlines the measurement metrics for Reduced Reliance and Improved Regional Self Reliance as set forth in the Delta Reform Act. Specifically, the sentence that provides the metrics for measuring "self-reliance" currently reads: "through a statewide strategy of investing in improved regional supplies, conservation, and water use efficiencies." We encourage that the existing Performance measures that gauge progress on these tools be labeled as "those that measure reduced reliance." If there are any proposed measurements to quantify water use over time, they should follow the Delta Reform Act to the letter and include "each region that depends on water from the Delta watershed," not just some as currently proposed. Exports represent a minority of Delta watershed diversions. Tracking water use throughout the watershed may be helpful information for some other Performance Measure, but California policy specifies other regional initiatives necessary to achieve reduced reliance on the Delta.

Thank you for your consideration. Clearly, developing a statewide plan that meets the Delta Stewardship Council's (DSC) coequal goals, while considering our State's diverse geography, climate, and growth rates, is challenging. Please know MWA is committed to working with the DSC, State Water Contractors, and our communities to develop plans for California water that are effective, equitable, progressive, and sustainable.

Sincerely,



Kirby Brill  
General Manager