

# RLO021 MWA



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January 14, 2013

Phil Isenberg, Chairman  
Delta Stewardship Council  
980 Ninth Street, Suite 1500  
Sacramento, California 95814  
By Email: [deltaplancomment@deltacouncil.ca.gov](mailto:deltaplancomment@deltacouncil.ca.gov)

**Re: Draft Final Delta Plan, Draft Program Environmental Impact Report, Draft Rulemaking Documents**

Dear Chairman Isenberg:

The Mojave Water Agency (MWA) appreciates the opportunity to comment on the Draft Final Delta Plan, Draft Program Environmental Impact Report, and Draft Rulemaking Documents. MWA concurs with the statements provided in the *Southern California Water Committee* comment letter and the *State Water Contractors, Inc.* comment letter, each dated January 14, 2013. Additionally, we would provide the following input:

RLO021-1

**Reduced Reliance Policy**

The Final Draft Delta Plan states in policy WR P1 that Reducing Reliance on the Bay-Delta and Improving Regional Self Reliance “will be demonstrated through a significant reduction in the amount of water used, or in the percentage of water used, from the Delta watershed.” Furthermore, the EIR assumes that Delta Plan implementation will result in reduced exports from the Delta. 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

RLO021-2

## Response to comment RLO021-1

Comment noted.

## Response to comment RLO021-2

This is a comment on the project, not on the EIR.

(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.

RLO021-2

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 by about 34%, although our population has grown by about 40%. Over the last four years the region has removed over 5 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 water 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 Council (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.**

RLO021-3

**Regulatory Authority**

In the current draft Delta Plan policy WR P1, the Council gives itself the discretion to review and judge local water management decisions outside the legally-defined Delta, inappropriately expanding the role of the Council beyond that outlined in statute and subjecting local agencies to an additional and potentially burdensome review process, irrespective of their water stewardship practices. **We ask that the DSC avoid including language in the Delta Plan that could be misinterpreted to regulate local water management decisions outside of the Delta through the covered action review process.**

RLO021-4

Thank you for your consideration. We hope these and other comments will contribute to your future deliberations to help ensure a reliable water supply for California and restore the Delta ecosystem.

RLO021-5

Sincerely,



Kirby Brill  
General Manager

cc: Draft EIR comments to Phil Isenberg by email : recirculateddpeircomments@deltacouncil.ca.gov  
Draft Rulemaking comments to Phil Isenberg by email:  
RulemakingProcessComment@deltacouncil.ca.gov

***Response to comment RLO021-3***

This is a comment on the project, not on the EIR.

***Response to comment RLO021-4***

This is a comment on the project, not on the EIR. Please see Master Response 1 regarding the Delta Stewardship Council’s authority over covered actions.

***Response to comment RLO021-5***

Comment noted.