January 18, 2018

California Water Plan Update 2018
Strategic Water Planning Branch
Statewide Integrated Water Management
California Department of Water Resources
PO Box 942836
Sacramento, CA 94236-0001
ATTN: Francisco Guzman

SUBJECT: Comments on California Water Plan Update 2018, January 4 version of Preliminary Draft, Chapters 4 and 5

Dear Mr. Guzman:

On behalf of the Mojave Water Agency, thank you for the opportunity to provide comment and suggestions to the California Water Plan Update 2018. The success of this plan’s implementation rests with the acknowledgment of the diverse needs of water agencies, the Water Plan’s companion programs, and regulations that allow regional flexibility to achieve long-term sustainability.

The Mojave Water Agency is one of 29 State Water Contractors and is responsible for a service area encompassing nearly 5,000 square miles in the Mojave Desert. With average annual rainfall totaling less than 6 inches, the Agency has implemented aggressive conservation programs and has invested in infrastructure for water recharge facilities that have produced impressive results including a drop in per capita consumption by 48 percent from 2000-2018. We are committed to achieving long-term sustainability, and it is with this resolve we respectfully ask consideration of the following comments on goals and definitions.

In the executive summary, page ES-1, the first recommended action, listed in Table ES-1, is “Improve Integrated Watershed Management.” The MWA recommends that the goal be revised to read: “Improve Integrated Regional Water Management Planning.

The California Water Plan encourages an “integrated” approach throughout the document, but does not recognize the Integrated Regional Water Management Planning (IRWM) efforts initiated in 2002 via SB 1672. These investments made by regions across the state through the IRWM process should not be viewed as a past effort, but should instead be included in a region's overall strategic plan and actions towards sustainability.
Under State Initiatives and Investments, page 1-1, the Regional Water Management Planning Act (IRWM) of 2002 (SB 1672) is noticeably absent in this list. Please include the following: “The IRWM process represents a significant investment of state and stakeholder resources, and serves as the model of successful collaboration among stakeholders of diverse interests to prioritize projects, programs and policies to manage water on a local level.”

Under Goal 1, Recommended Action 1.3, page 3-1, this recommended action needs to acknowledge the protection of existing water rights and possible required downstream environmental flows.

Under Goal 2, Recommended Action 2.1, page 3-2, MWA requests the inclusion of an exemption for adjudicated basins.

Under Goal 3, Recommended Action 3.2, page 3-2, Facilitate Multi-Benefit Water Management Projects. Consider the addition of language that promotes the dual conveyance model under the Bay-Delta Plan to promote reduced reliance on the Bay-Delta by allowing water agencies to purchase water under wet years for storage to augment supplies in dry years.

Under Goal 4, page 3-2, MWA requests that the goal be revised to read: “Provide Resources for California’s Under-Represented or Vulnerable Communities”

On page 4-6, a “Water Surcharge Fee” is listed as a novel mechanism. The Mojave Water Agency is opposed to a surcharge or “water tax.” The majority of the MWA service area is considered disadvantaged or severely disadvantaged, and a water tax would hurt the people who need assistance. There is no guarantee that a surcharge on utility bills to fund these initiatives outlined in the California Water Plan would be returned to source. The MWA supports use of the State general fund to provide funding for on-going state agency administrative work, and project funding mechanisms that are built on leveraging local funding and developing and implementing local solutions. This model has proven to work well within our service area.

Again, thank you for the opportunity to provide comment on this important draft document. Please know we welcome working with the Department of Water Resources as we work collaboratively to achieve water sustainability for our state.

Sincerely,

Thomas D. McCarthy, PE, PG
General Manager