

DOCKETED

Docket Number:	97-AFC-01C
Project Title:	High Desert Power Plant (COMPLIANCE)
TN #:	210667
Document Title:	Letter from MRB Watermaster RE discharge of recycled water to Mojave River
Description:	Letter sent by Mojave Water Agency (Basin Watermaster) to CEC staff regarding discharge of recycled water from VVWRA to the Mojave River.
Filer:	AbdelKarim Abulaban
Organization:	California Energy Commission
Submitter Role:	Commission Staff
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[13846 Conference Center Drive ♦ Apple Valley, California 92307](http://13846.Conference.Center.Drive.Apple.Valley.California.92307)
Phone (760) 946-7000 ♦ Fax (760) 240-2642 ♦ www.mojavewater.org

March 8, 2016

Abdel-Karim Abulaban
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Re: High Desert Power Project (97-AFC-01C)

Dear Mr. Abulaban:

As noted in our letter dated February 19, 2016 the MWA and Watermaster support actions consistent with the MOU between CDFW and VVWRA regarding minimum flow requirements at Lower Narrows as well as minimum total discharges by VVWRA to the Alto Transition Zone. Although MWA was not a party to this agreement, we support it in that it reflects a compromise of all the parties at the time it was put together as well as a balance of all interests.

Watermaster's responsibility, however, is to interpret and enforce the provisions of the Judgment that relate directly to minimum flow obligations between Subareas (Alto and Centro for example). From a hydrologic perspective the Alto Transition Zone water levels have shown seasonal variability and long term stability for decades and that condition still exists. The Judgment provides a mechanism to protect the Alto Transition Zone, however, the protection comes at the expense of all of the other Parties to the Judgment in Alto. VVWRA discharges are a fundamental part of the Alto Transition Zone water supply.

In order to address your questions directly it would require significant effort and a lengthy analysis to understand CDFW's opening testimony and additional claims. There would be a need to develop independent projections relative to the long term health of the Alto Transition Zone and its functions and the health of the habitat protection defined in Judgment.

Abdel-Karim Abulaban-CEC

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Watermaster might be able provide additional insight as you are requesting, however if we were going to undertake any analysis, it would require the expenditure of public funds which would first have to be approved by the Board of Directors of Mojave Water Agency and this cannot be accomplished by the March 8th deadline to file testimony.

Sincerely,

A handwritten signature in black ink, appearing to be 'KB', written in a cursive style.

Kirby Brill
General Manager

cc: William J. Brunick, Esq.