

July 31, 2015

California Water Commission  
Joseph Byrne, Chair  
P.O. Box 942836  
Sacramento, CA 94236-0001  
*Sent via email*

**RE: Water Storage Investment Program  
Water Bond Risk Factor Disclosure**

Dear Members:

The members of the California Water Commission (“CWC”) have been tasked with the responsibility of allocating \$2.7 billion in Proposition 1 bond funds (the “Funds”) that were issued in November of 2014. On its website, the Commission states its commitment to allocating the Funds in an *open, transparent, fair and cost-efficient manner* and in a way that *maximizes the sound and responsible investment of public dollars*. In order for the CWC to accomplish its goals, I believe it is imperative that the members of the CWC understand the details of the availability of surface water, so that you can properly assess the true economic benefit and long term risks associated with the projects proposed for bond funding. Further, understanding the true value of surface water available will help the CWC analyze existing Board Member clients and/or relationships that could result in a current or potential conflict of interest, where the CWC Board Member has discretion in directing public funds that may benefit these very same clients and/or relationships.

**I. The CWC Must Acknowledge Facts Regarding True Value Of State Water Project (SWP) “Allocations”**

During the past few years, multiple independent researchers and sources have reported that the State of California’s surface water supplies are overcommitted and overvalued. On October 26, 2012, the California Water Impact Network, on behalf of itself and two other interest groups, submitted formal testimony and data to the SWRCB that demonstrates with certainty that the surface water available from the Bay-Delta Estuary that ultimately provides all the wet water for the SWP has been more than 5 times overcommitted.<sup>1</sup> The quantification proved that there are **ONLY** approximately **29 million acre feet** of water available, but that approximately **153 million acre feet** have been allocated or permitted. This study takes into account all water rights – including pre-1914 water rights. In 2014, a comprehensive study conducted by two UC Davis professors was published that affirms these conclusions of overcommitment when looking at water permits statewide granted after 1914, finding that “most of California’s major river basins have water rights allocations that exceed their natural, unimpaired annual supply.” (Grantham & Viers, *100 Years of California’s Water Rights System: Patterns, Trends, and*

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<sup>1</sup>[http://www.waterboards.ca.gov/waterrights/water\\_issues/programs/bay\\_delta/docs/comments111312/tim\\_stroshane.pdf](http://www.waterboards.ca.gov/waterrights/water_issues/programs/bay_delta/docs/comments111312/tim_stroshane.pdf)

*Uncertainty*, Environ. Res. Lett. 9 (2014).) Almost every major urban or agricultural region in the state currently takes a significant portion of its water from the Delta via the SWP. (Department of Water Resources, *The State Water Project Draft Water Delivery Capability Report* (April 2015), pg. 9.) As a practical matter, however, the SWP has the lowest priority of right to the water available from the Bay-Delta Estuary.

The overcommitment problem has been inherent in the SWP from the beginning.<sup>2</sup> Recognition of this fact is critical because the CWC is preparing to authorize BILLIONS of dollars of Funds to support groundwater storage and exchange projects involving SWP water. The overcommitment of SWP water means that the vast majority of the SWP allocations owed to SWP dependent agencies do not have the wet water to back them up. Water is the only resource we as humans need in order to survive. Knowingly overcommitting California's surface water and now trying to hide the overcommitment underground will result in economic harm to overlying landowners with groundwater rights where storage schemes take place, and also future environmental damage.

#### **a. SWP Allocation Overcommitment Results In "Paper Water"**

The difference between what is actually available to supply the SWP and that which DWR has committed through permit is called "paper water" and, in reality, doesn't exist as real wet water.<sup>3</sup> Yet SWP contractors and others have been engaging in transactions for years based on these paper water "allocations." Paper water is essentially an IOU that, in its entirety at any given moment, can never be paid with real, wet water. The expenditure of *any* Funds for the purpose "storing" any paper water underground would be a misuse of public funds, as this water does not physically exist. Further, such storage projects would result in the theft of groundwater in the regions in which they are established when the note for real, consumable water is inevitably "called" by developments or projects that relied on that "stored" paper water.

In short, it would be an abuse of the public's trust, as well as their money, to fund projects that intend to store "paper water," as all indications are that these paper water allocations can *never* actually be filled given the overcommitment of the SWP.

#### **b. The SWP's Pay Or Take Clause Has Put Water Purveyors In A Financial Bind**

The DWR's overcommitment of SWP water has led to the creation of a "sub-prime" paper water market. The contracts between the DWR and the SWP contractors require SWP contractors to pay for all allocations of water, *whether or not actual wet water is delivered*. There is an inherent tension in the SWP contracts that requires SWP contractors and subcontractors to charge their

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<sup>2</sup> "There is no question that the SWP cannot deliver all the water to which contractors are entitled under the original contracts. It does not appear that SWP has ever had that ability." *Planning & Cons. League v. Dept. of Water Res.* (2000) 83 Cal. App. 4th 892, 913.

<sup>3</sup> *Id.* at 914.

ratepayers for allocations of water that the DWR does not have to provide because there isn't enough surface water in existence.

The financial predicament this forces on water purveyors who are wholly or partially dependent upon SWP has been further exasperated by Governor Brown's mandatory water restrictions, as well as recent court decisions that have called into question tiered rate systems. How can SWP contractors pay their debt on water that only fractionally exists but which they have to pay for in full? Water purveyors who are wholly or partially dependent upon SWP cannot collect their normal revenues, either because of the mandated water use restrictions, or because they are being sued for their rate structures. These water purveyors can only bill customers for water actually used/delivered, plus the cost of delivering it, yet they are charged year in and year out by DWR for water that they never receive. It does not take an economics expert to see that this is a financially unsustainable model for the SWP dependent districts and municipalities.

**c. Bond Money Spent To Store "Paper Water" Is A Possible Misuse Of Public Funds**

There is a legitimate concern that ratepayers in California, who have already subsidized the original costs of the SWP, will now essentially be double taxed in order to provide them with water allocations that should have been provided through the original bonding and construction of the SWP. The fact that DWR has not properly calculated the true amount of the surface water available for allocation (both within and outside of the SWP) has resulted in a *misuse* of the original public funds used to fund the project. Now there is a very high likelihood of similar misuse of the Prop 1 Funds. The only way to ensure that this does not happen is to only allow storage of real wet water that actually, physically exists and only in adjudicated basins where a safe annual yield has been determined and space is scientifically proven to exist. Additionally, there must be a requirement for transparent, detailed, and verified accounting of all **wet** SWP water that is stored in the entire State of California (whether in private, public or quasi-public/private underground storage) that the public can easily access.

At the heart of the current problem lies the reality that the original SWP was built based on a false assumption of water availability, cost millions more than it was expected to, and, over the long term, will never be capable of delivering the amounts of water that the original financing structure envisioned. These are errors that should not be repeated with projects under Prop 1. It is the CWC's responsibility to ensure that public funds are not spent in furtherance of the miscalculations that the DWR has made, and Funds should not be spent to bail out the existing SWP contractors under the guise that these are new, legitimate "investment opportunities." When, in light of the SWP over commitment, these public funds used to store SWP underground are really an attempt to sweep *under the carpet* (or, in this case, underground) the original over commitment problem of the surface water supply.

## **II. Improper Calculation of Private Sector Risk Due to Existence of Paper Water**

### **a. Water Storage Schemes Involving Paper Water May Mislead Private Sector Investors on Risk Analysis of Investment**

Currently, private investors are being sought and marketed to “invest in California’s water future.” It is unclear whether private sector investors have been given all the facts regarding the availability of surface water to store underground. Shareholders of various corporations and/or individuals who invest in SWP storage projects<sup>4</sup> need to be given an accurate evaluation of their investment. DWR is not accurately calculating the amount of surface water available for the SWP, therefore it appears there may be a very high probability that private sector investors will inaccurately evaluate the risk associated with investment in underground storage of SWP water.

Another concern is that private investors probably do not fully appreciate the future liability they may have for environmental impacts or to the overlying landowners where banking of SWP paper water occurs. If these investors are not being told the truth about the SWP’s overcommitment, and thereby the inherent risks of ground-banking paper water, then the financial forecasting that they are doing to determine return on investment may be severely different than reality permits.

### **b. A High Risk of Water Rights Litigation Is Essentially Unforeseen By Private Sector Investors Due To A Failure To Properly Disclose Existence of Paper Water**

The CWC should be equally concerned with the water rights of the overlying landowners in the various areas where these projects are being developed as it is with potential investor liability. It seems a very high likelihood that wherever SWP water is stored below ground, overlying landowners will inevitably lose their water rights over time, as SWP water will increasingly be shown *on paper* to occupy their basin. Landowners will be told that the native supply of their basin was decreasing anyway before the banking began (whether or not that is actually true), and thus any water that is underground must be stored water that belongs to bankers. With the commingling of native, imported, and paper water, there is an inherent risk of groundwater disputes and ultimately litigation and adjudication in basins used for groundwater storage. These facts may be unknown to landowners and investors alike, who may not be familiar with these issues, or the way things have played out in other jurisdictions where groundwater banking has been attempted (see list of geographic regions on the next page). It is the CWC’s responsibility to ensure that private sector investors are not misled, and that existing overlying rights are not diminished by these projects.

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<sup>4</sup> An example of such a project is the Cadiz project in San Bernardino County. See <http://cadizinc.com/water-project/> (Phase 2 of the Cadiz Project making up to one million acre-feet of groundwater storage space available for imported water including SWP water).

It is highly suspicious that the geographic regions that have already stored and/or exchanged SWP “allocations” (recall, SWP is over 5 times overcommitted) are experiencing rapidly decreasing water quality and lowering of the groundwater levels. The *obvious* question that must be answered is: Is the stored/exchanged SWP allocation less than the amount of real wet water taken out? I suggest a thorough examination and analysis of the existing banking and exchange programs in these geographic areas before any new banks are approved for funding:

- **Kern County:** The Kern Water Bank storage and related litigation;<sup>5</sup>
- **Ventura County:** The Las Posas Basin Aquifer Storage & Recovery Project<sup>6</sup>;
- **Riverside County:** The Coachella Valley Water District (CVWD) bank/exchange program with Metropolitan Water District (MWD), and the Agua Caliente Indian Tribe lawsuit against CVWD;<sup>7</sup>
- **San Bernardino County:** The Mojave Water Agency bank/exchange program with Kern County entities.<sup>8</sup>

It is imperative that the CWC analyze and investigate whether these storage and/or exchange schemes involving SWP allocations involved the storage or exchange of SWP paper water. In order to do a proper investigation of these projects, a comprehensive historical accounting of all water stored all over the State of California, compared with a wet water analysis of all water conveyed through the SWP, must be made otherwise the mathematical computation will not correlate with reality.

### **III. Questions That CWC Must Examine in Order to Disperse Public Bond Funds for Underground Storage of SWP**

#### **a. Does Paper Water Result In An Improper Calculation Of Credit Ratings For SWP Dependent Agencies?**

On May 5, 2015 the front page of the Money & Investing section of the Wall Street Journal had an article entitled “*Latest Victim of California’s Drought: Water Bonds*” written by Aaron Kuriloff. Citing analysts and rating firms, Kuriloff notes that credit ratings may weaken and prices for outstanding bonds will fall if shortages of water persist. He summarizes the trend in decline over the past few months in water and sewer bonds. Mr. Michael Johnson, co-chief investment officer

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<sup>5</sup> Barringer, F. *Storing Water for a Dry Day Leads to Suits* (N.Y. Times, July 26, 2011), available at [www.nytimes.com/2011/07/27/science/earth/27waterbank.html?\\_r=0](http://www.nytimes.com/2011/07/27/science/earth/27waterbank.html?_r=0)

<sup>6</sup> <http://bigstory.ap.org/article/millions-spent-water-storage-plan-leaks>

<sup>7</sup> Stevens, M. *Tribe Fights Coachella Valley Water Agencies For Aquifer Rights* (L.A. Times, March 31, 2015) available at: [www.latimes.com/local/california/la-me-water-conflict-20150331-story.html#page=1](http://www.latimes.com/local/california/la-me-water-conflict-20150331-story.html#page=1)

<sup>8</sup> Mueller, D., *Mojave Water Agency Sells Our Water Allocations from the State*, (Liberty Tribune, August 1, 2013). As this article is no longer available online, I have attached a copy of the article for your convenience.

of Gurtin Fixed Income Management LLC, interviewed by Kuriloff for the article, stated that heavy investor demand for California debt of all types has raised the prices for most water bonds. The conclusion is investors may be overpaying for debt from districts with “*growing but unacknowledged financial problems*”. Kuriloff notes some experts as saying that even though the water bond market is prized for safety and stability that there may be *hidden pockets of risk* that are *not properly disclosed and priced*.

This past April, Moody’s Investors Service warned investors that water restrictions in California could curb revenue at water agencies. Fitch Ratings noted that without water rate increases, downgrades of water bonds could occur. This month, however, the California Supreme Court let stand a published California Court of Appeals case that dealt a major blow to water agencies’ ability to generate more revenue during times of drought, by striking down a tiered usage pricing system that bore no apparent relationship to the actual cost of delivering the water.<sup>9</sup> Water agencies with similar pricing schemes have been scrambling to justify their pricing ever since, and additional ratepayer lawsuits have been filed.<sup>10</sup>

Rather than unbridled optimism about the security of municipal water bonds, there should be great concern that existing bonds for the cost of infrastructure and water of the SWP currently have a very high risk of default that is unknown by municipal bond investors and the taxpayers of California. Bond rating agencies are not properly calculating the risk associated with entities that are highly dependent upon SWP because the bond rating agencies (as well as the public) are largely unaware of the DWR’s miscalculation of surface water availability for the SWP and how this miscalculation has caused a huge financial stress upon the agencies obligated to “take or pay” – *a very well hidden pocket of risk*. The take or pay clause created the perfect storm the system is in today. The take or pay obligations imposed by the SWP contracts, the lack of available wet water to sell to customers due to the DWR overcommitment of SWP, the state-mandated reductions in customer use, and the legal obstacles to raising rates to compensate has created a *growing but unacknowledged financial problem* that is affecting many water agencies throughout the state. Marketing these bonds as a secure investment opportunity in this day and age could be a grave mistake, and the CWC should review and revise its marketing efforts accordingly.

**b. Is Prop. 1 Water Bond Money Really A Taxpayer Financed “Bail Out” For Both SWP Dependent Agencies And DWR?**

Given the existing problems with the SWP, it is questionable whether the expenditure of \$2.7 billion for “underground surface water storage” is really an investment opportunity in California’s future, as stated on the CWC website. Rather, it appears that the taxpayers of California may have unwittingly voted to spend \$2.7 billion dollars to “bail out” the SWP contractors from being forced to pay for a surface water source that is over 5 times overcommitted and mismanaged. This bail out would give SWP contractors access to real, wet

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<sup>9</sup> *Capistrano Taxpayers Association v. City of San Juan Capistrano* (2015) 235 Cal. App. 4th 1493.

groundwater by banking or exchanging SWP allocations obtained under the guise of being groundwater storage projects. This billion dollar bail out will not only be shouldered by tax payers but also unsuspecting overlying landowners and the environment where these underground storage schemes are located. These issues need to be resolved between the parties to the original SWP contracts – not solved by stealing groundwater from unsuspecting regions completely independent from the SWP, like the Paso Robles Groundwater Basin.

Ratepayers in California who have already subsidized the original costs associated with infrastructure and water supply from the SWP will be double taxed in order to provide them with water allocations that should have been provided with the initial bond and construction. Furthermore, given the recent emergence of projects proposed by private companies that rely on the banking of SWP water, there is always the danger that some of these Funds could end up financing projects that have more private benefit than public benefit.<sup>11</sup> Using Prop 1 Funds to generate private profits would be the ultimate abuse of taxpayer funds. The CWC must be extra cautious and vigilant in how the Funds are dispersed in light of circumstances such as these, where the projects that are presented to them could be rife with undisclosed agendas and interests.<sup>12</sup>

### **c. CWC Must Examine Its Own Conflicts Of Interest**

Any entity that receives SWP water has a vested interest in seeing the system bailed out, or at least making sure that the allocations that they have already paid for are backed up by real, wet water. As discussed above, it is imperative that the CWC ensure that this does not occur to the detriment of investors, landowners with groundwater rights, or the environment. It appears that some members of the CWC may, in their other capacities, represent the interests of agencies partially or wholly dependent upon the failing SWP. Such members may find themselves in an uncomfortable and tenuous position when being asked to properly evaluate viability and wisdom of certain Prop 1 projects. There appears to be an inherent conflict which would result in an appearance of impropriety if such members to vote to allocate Funds to projects that will benefit their clients or water agencies with which they are involved. I was unable to find a conflict of interest or abstention policy on the CWC website, and would encourage you to post one if you

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<sup>11</sup> Notably, the Kern Water Bank, which was established by DWR using the funds of SWP contractor ratepayers, is now largely under private control.

<sup>12</sup> Indeed, the current situation is already eerily similar to Enron's failed venture into groundwater banking in the late 1990s. According to a report by Public Citizen, shortly before its collapse, Enron purchased a large ranch in Madera County "in hopes of developing a water bank in the underlying aquifer to store and sell water.... Meanwhile, Enron and Azurix made large contributions to a group that advocated passage of a \$1.9 billion state water bond issue, funds from which could potentially be used for the Madera project, and to California Gov. Gray Davis, who appoints the head of the agency responsible for allocating these funds." (Public Citizen's Critical Mass Energy & Env. Prog., *Liquid Assets: Enron's Dip Into Water Business Highlights Pitfalls Of Privatization* (March 2002), available at: [www.citizen.org/documents/LiquidAssets.pdf](http://www.citizen.org/documents/LiquidAssets.pdf))

have it, or develop one if you do not have it, so that the administration of the Funds can be truly transparent and above reproach.

#### **IV. Conclusion**

The CWC, along with the SWRCB and DWR, has a responsibility to the agencies seeking Funds, the private sector investors providing them, and to the general public to ensure that there is full disclosure and understanding of the actual amount of surface water available to store, before any use of Funds for subsurface storage projects is made. The members of the CWC have a corresponding personal fiduciary responsibility associated with their very high position of public trust. They may not knowingly misuse taxpayer funds. Appropriating Funds for the below-ground storage of fractional value SWP water would be such a misuse of public funds, in light of the facts that have been provided above. Additionally, this would be an egregious disservice to investors, landowners, and the environment. Prior to marketing the bonds for these projects as solid investment opportunities, bond investors and bond rating agencies (Moody's, Fitch and Standard & Poor's) alike must be made aware of the overcommitment of surface water and the other current threats to local water agency credit ratings, so that they may properly assess the risk of default on both the Prop 1 bonds, and the existing bonds for municipal agencies dependent upon the SWP. Finally, the public should be fully informed of each of the issues presented in this letter, and be assured that each issue has been taken into account when allocating the Prop 1 Funds and crafting a solution to California's water crisis. The State of California must avoid a deepening of the current crisis of surface water mismanagement and craft more intelligent solutions than have been attempted in the past.

**I urge each commissioner to take the fiduciary duties of their position seriously, and independently investigate these issues and review the citations in this letter. I ask the CWC to commit to full disclosure of actual wet surface water availability. This will ensure the open, transparent, sound and responsible expenditure of public dollars when evaluating the projects presented to the CWC for underground storage.**

Sincerely,



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CC:

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Department of Water Resources  
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Water Asset Management, LLC, Disque Deana, Jeffrey Markley  
Globalnet Venture Partners, John Bohn  
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Thursday, 01 August 2013 11:31

# Mojave Water Agency Sells Our Water Allocations From State

Written by David Mueller

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MWA President Kimberly Cox said that "now is the time to strike while the iron is hot!" Director Doug Shumway said, "this is a game changer". Director Page seconded his sentiments and said that "some people just won't get this". That comment was followed by an audible snicker from Director Shumway. How do I know it was him? I've listened to hours of the MWA Board of Directors meetings. What Director Page meant was people like me, and since I live in Director Shumway's district, he knew exactly what Page meant.

The board is correct that I don't get it. I don't understand how the Mojave Water Basin, that we've been told for decades now,

can be in serious overdraft, but not take every drop of water made available by the State through the Dept. of Water Resources (DWR). No, instead MWA General Manager Kirby Brill is now recommending an exemption of CEQA rules and the sale of our 2013-2014 water allotments. Not all of it mind you, but most of it.

Did you read about this in any local paper? The vote took place June 13, 2013. I've attached the documents and the Powerpoint presentation that explains it. Why isn't the Daily Press covering a story like this? When people in Apple Valley are saying they have \$300 water bills or higher, you would think this would be a headliner? Not a word.

Under the plan, the MWA will sell water that is identified as Pooled or Turned Back. What this means is each water agency in California, which the MWA is but one, must request in May each year how much of the water allotted they will take. Each agency can only take whatever they are allotted, less whatever reductions the DWR puts on the total due to availability. This year the State is saying we can take just 35% of our allotment because the snowpack in the Sierra wasn't good this past winter. Once the water is requested, it can't be sent back up the aqueduct from San Luis Reservoir- so it becomes Turn Back. Pooled water is what is stored in the reservoir. Since the Turn Back water is already sent, it is available now, and buyers want to buy it. According to the MWA, this is groundbreaking stuff they are going to do. The truth is I studied DWR turn back water when I was writing for hdpolitics.org and have a spreadsheet that identifies that we were almost giving our water allocations away beginning about the time we "purchased" additional permanent water rights from a billionaire named Stewart Resnick.

This is how the scam works. Resnick formed his own water bank in Kern County (Kern Water Bank) in 1996. His company, Paramount Farms, bought up many Kern County farms that were going under after the State cut water allocations to the Central Valley. Resnick gained control of the Kern County Water Agency through incremental purchases of smaller districts within the agency. Dudley Ridge and Berranda Mesa Water Districts are under Resnick's control and "sold" the MWA permanent rights to his water districts State water allocations. You and I pay for that through our property tax as MWA assessments. Resnick has never delivered a drop of that water which he sold to the MWA first in 1997-98. His two sales were worth \$98.5 million- and he never delivered any water to the MWA- not one drop.

Resnick not only fleeced High Desert taxpayers for the permanent water sales, he also was buying the water allocations the MWA Turned Back to the State, which is part of the Water Pool and Turn Back programs from the DWR. Resnick took shares of our allotments starting in 1999- so when the MWA Board tells you this is a game changer and brand new thinking, they are lying. The MWA sold our Turn Back water to Resnick and the Metropolitan Water District of Southern California for \$5.95 per acre foot- but today the MWA sells water to you and I for \$425 per acre foot! The MWA engaged in this policy from 1999-2003 and Resnick banked 133,929 acre feet of our Turn Back water. What do you suppose that water is worth today?

Mr. Brill has gotten a little smarter today. He thinks he can sell large chunks of our allocations for much more money- estimating as much as \$16 million in revenue for 2013. We are so water desperate folks, that we don't need the 82,800 acre feet we are allotted each year. According to the Powerpoint presentation I've attached, we only need to have around 10,300 acre feet to meet MWA "Hard Demands". What are the cities in the High Desert using for drinking water? The aquifer that is a virtual ocean under our feet that these people keep telling us is seriously

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overdrafted! Actually, at 38 minutes of the audiotape, you will hear Mr. Gobler of the MWA say that the water levels are rising and the aquifer in the Alto region "is better than its ever been".

It's important to remember before closing this story that the MWA is paying the MWDSC ( Los Angeles) to store their water for them on a deal signed not long ago. Under that deal, the nut and shell game being played here is harder to track, because they supposedly store their water in our aquifer and then have a contractual agreement to remove it upon request- and we pay them to do it! Water just looks like water to me. How do I know we didn't give them our water? The MWA assured me that the MWDSC only takes our allotment from the aqueduct- not our groundwater. I repeat, water looks like water to me.

So if the MWA is selling our water, who is buying it? Find my attachment below and read the highlighted text and notes in the margin. These people are committing fraud- and Director Shumway snickers about it. As your water rates continue to skyrocket remember me when I told you first that these people are white collar criminals who are not engaging in the public interest but are instead using their elected offices to fleece the public. We don't have a critical water shortage, or these people would take all available water from the aqueduct and be declaring an eleven alarm regional water emergency!

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Attachments referenced by David Mueller, see footnote 8  
Liberty Tribune Article August 1st, 2013:

MWA\_Water\_Pool\_Program  
Item\_11\_PowerPoint

Can be accessed at [www.protectyourwaterrights.com](http://www.protectyourwaterrights.com)

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Paula Burns • 4 months ago

Wow! It seems there are no limits for white collar criminals. I wonder if the daily press is ignorant to what is going on or were they threatened into not making an article about this? Is there an equally rich person WITH A CONSCIENCE that can or would combat this? To quote Jack Johnson "Where'd all the good people go?"

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David Mueller → Paula Burns • 4 months ago

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#### Water District



Ragtime For VVWRA  
Is your posterior, after you use the toilet, as clean as it could be? Perhaps you would like to try...

Comments (0)

#### Park & Rec



Hesperia's Park and Rec - Refuse to be a Victim  
This seminar will provide common-sense information geared toward awareness and avoidance of criminal attack. The instructor helps seminar participants better...

Comments (0)

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Department of Water Resources  
Cathy L. Crothers - Chief Counsel  
P.O. Box 942836  
Sacramento, CA 94236

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