California Water Plan Update 2018
Strategic Water Planning Branch
California Department of Water Resources
Attn: Mr. Francisco Guzman
cwpcom@water.ca.gov


Dear Mr. Guzman,

Groundwater Resources Association of California (GRA) appreciates the opportunity to review and provide comments on the California Water Plan Update 2018 Public Review Draft (Update 2018). We also appreciate being invited to participate as a member of the Plan Policy Advisory Committee and acknowledge the hard work of DWR’s plan preparation team in developing a concise and focused document with a well-presented investment strategy.

GRA membership includes approximately one thousand professionals located throughout California with technical and legal expertise in groundwater. GRA has helped formulate statewide policy on the development, management, and protection of the state's groundwater resources.

We are concerned that Update 2018 is incomplete in its presentation of groundwater condition changes since Update 2013, implications of the Sustainable Groundwater Management Act (SGMA), and the investments required to achieve groundwater sustainability. Our broad comments are below. We are requesting a face to face meeting with DWR to discuss several specific ideas for incorporating these comments in the plan and supporting documents.

Groundwater Conditions Have Degraded Over the Past Five Years
Since Update 2013, the state has experienced a significant drought from 2012-2016, followed by the second wettest year on record. The drought has exacerbated chronic groundwater depletion in the state, increased land subsidence, and reduced surface water availability, leading to increasing groundwater extraction, most significantly in the San Joaquin Valley. This situation underscores the need for funding for groundwater programs such as recharge, developing water markets, and rehabilitation of aging infrastructure and enhancements to conveyance to move water south in the state.
Significance of the Sustainable Groundwater Management Act to Update 2018
Update 2018 includes very little information on SGMA, does not articulate its significant mandates, or outline linkages to statewide groundwater and surface water planning. It also provides little on the implementation progress and future challenges for either DWR, other state agencies, or the groundwater sustainability agencies (GSAs) and cooperating local agencies. Important SGMA-related needs with regard to groundwater sustainability plan (GSP) preparation and implementation include increased recharge, statewide and local data collection, technical review and guidance, as well as better, more integrated management of water demands. Information on water use practices are missing.

Cost for Groundwater Programs
The plan likely underestimates the cost of current and future groundwater programs for achieving sustainability. Data collection, monitoring, data management, GSP development, GSP implementation, and capital costs for projects to meet the SGMA mandates are significant. Groundwater quality regulatory programs such as Irrigated Lands Regulatory Program and CV-SALTS, with implications for groundwater supply are not mentioned and investments required for compliance with these programs are missing. Lastly, reliable infrastructure (Goal 2) will be a key element to increase recharge of groundwater basins on a statewide scale, one of the tools to obtaining sustainable groundwater supplies required under SGMA. The ability to maintain, rehabilitate, and replace current and future infrastructure with acceptable levels of risk and minimized life cycle costs can only be properly conducted with an asset management plan. Therefore, to improve the planning process and better estimate future costs asset management plans should be written for all DWR facilities.

We appreciate your consideration of our comments and hope they lead to an improved Update 2018. Please feel free to call me at 530 304 3330. As stated earlier, we are requesting a meeting with DWR before this plan is finalized to discuss several specific ideas for incorporating these comments in the plan and supporting documents.

Sincerely,

Chris Petersen
GRA’s Update 2018 Policy Advisory Committee Representative

Cc: GRA Board of Directors
    Rosanna Carvach, Brownstein Hyatt Farber Schreck
    Taryn Ravazzini, Deputy Director of Special Initiatives