January 21, 2019

Karla Nemeth, Director
California Department of Water Resources
P.O. Box 942836, Room 1115-1
Sacramento, CA 94236-0001

Subject: Comments on California Water Plan Update 2018 – Public Review Draft

Dear Director Nemeth:

The California Urban Water Agencies (CUWA) welcomes the opportunity to provide input on the Public Review Draft of the California Water Plan Update 2018 (Update 2018).

We thank the Department of Water Resources (DWR) for conducting a robust stakeholder process that allowed for constructive dialogue on important water sustainability issues. In general, we found the shorter format of Update 2018 easier to digest and appreciate that the plan touches on a wide range of issues. We also thank DWR for acknowledging that each region has unique and variable characteristics and that some communities have proactively planned and invested in water management strategies, demonstrating considerable resilience.

With a modest level of refinement and reorganization, Update 2018 would present stronger messages and provide greater value. Toward that end, we offer the following recommendations for your consideration.

• Strengthen alignment with other state plans by building more directly on Governor Brown’s California Water Action Plan (CWAP). Update 2018 states that it supports the CWAP, which “describes a set of essential actions intended to lay the foundation for sustainable water management in the coming decades.” To strengthen this connection, we suggest framing the front end of Update 2018 with the 10 CWAP actions, summarizing the progress to date (e.g., content from Chapter 1 [State Initiatives and Investments] and the recently released Implementation Report\(^1\)), and connecting recommendations to the CWAP.

• Improve consistency, organization, and formatting throughout the document. While Update 2018 contains valuable content, we offer the following specific suggestions to enhance its readability and strengthen key messages.
  – Confirm that the Executive Summary accurately reflects the information included in the rest of the document. For example, the Executive Summary states that Update 2018 “introduces implementation tools to inform sound decision-making” (ES-1). However, no implementation tools are explicitly discussed in Chapters 1 through 4.

Use consistent colors and legend categories in Figures 1-1, 1-2, and 1-3. For example, the colors used for different water supplies in Figure 1-1 differ from those in subsequent figures. In addition, “Reuse” and “Recycled Water” are combined in Figure 1-1 but shown separately in Figures 1-2 and 1-3, even though these terms are often used synonymously.

Clearly define the differences between “critical” and “systemic and institutional” challenges, as these groupings are not necessarily mutually exclusive. Also, given the large number of critical challenges, we suggest numbering the list and combining a few items to make the list more manageable (e.g., “increasing flood risk” and “catastrophic wildfires” could be combined under “more extreme hydrologic events”).

Frame the recommended actions in Chapter 3 with a similar level of detail. Some actions (e.g., 1.1 — Address the Water Management Needs of California’s Most Vulnerable Communities) are broad enough that they could be standalone goals, while others (e.g., 6.4 — Develop Regional Water Management Atlas) are quite specific, with one clear outcome.

- Confirm consistency among Update 2018, its supporting documents, and DWR’s web portal. For example, DWR’s website mentions that the 2018 Update organizes the intended outcomes around four “societal values”. These values are mentioned only once in Update 2018 (in the callout box on p. 2-1) and are not clearly tied to intended outcomes. In addition, the contents of Tables 73 and 74 in the supporting document “Historical Expenditures and Current and Future Funding Needs” conflict with Table 4-1 in Update 2018 (CH2M Hill, 2018).

- Confirm consistency of Sustainability Outlook Indicators with established and/or pending State goals. For example, the target outcome for indicator “HE3 - Distribution System Leaks and Losses” as mentioned in the “Sustainability Outlook Indicators Description and Methodology” is zero. This target, and the methodology for assessing water loss at a watershed level, is not consistent with the methodology to be set by the State Water Resources Control Board under Senate Bill 555. Furthermore, this target is unrealistic, as no water system will have zero losses.

- Use the most robust and accurate sources of data available. For example, the data used for the “HE3 - Distribution System Leaks and Losses” indicator description are from 2015 Urban Water Management Plans; however, this dataset has not been validated. We suggest DWR utilize the water loss audit data already collected and validated for 2017 and 2018. Additionally, comparisons of total water loss volumes between regions are misleading, given inherent differences among utilities.

- Provide a more complete conclusion that outlines next steps. Chapter 2 includes a long, thorough discussion of challenges, yet Chapter 3 dedicates only a single sentence to some of the recommended actions. Furthermore, Update 2018 does not draw any conclusions or recommendations from the funding scenario analysis. We suggest ending the plan with a more complete conclusion that frames next steps and identifies areas for ongoing stakeholder involvement. When developing more granular recommendations and funding scenarios, it is prudent that DWR do so through a stakeholder process. CUWA appreciates that the funding scenarios in Update 2018 focus on current funding mechanisms and not on a water surcharge or “tax”. A water surcharge could divert funds that would otherwise provide for local water needs and result in new inefficiencies. We support continued focus on a general fund solution as a more appropriate way to provide long-term funding.

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2 https://water.ca.gov/Programs/California-Water-Plan/Water-Plan-Updates
We hope these comments are helpful, and we look forward to continued dialogue as more specific recommendations are developed. Please contact Katie Ruby at 925.210.2256 with any questions, for further detail related to our comments, or for additional assistance from CUWA in any way.

Sincerely,

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CUWA Executive Director

Katie Ruby
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