January 21, 2019

Mr. Paul Massera
Manager, Strategic Water Planning Branch
California Water Plan Update 2018
Statewide Integrated Water Management
California Department of Water Resources
Attn: Francisco Guzman
P.O. Box 942836
Sacramento, CA 94236-0001


Dear Mr. Massera:

The Regional Water Authority (RWA) appreciates the opportunity to comment on the California Water Plan Update 2018 (Plan Update). RWA is a Joint Powers Authority that represents 21 water providers serving 2 million people in the greater Sacramento region. We were born out of an agreement among water providers, environmental groups, businesses, and local governments to address the coequal objectives of water supply reliability and environmental protection in the region. Our mission is to protect and enhance the reliability, availability, affordability and quality of water resources for our members. Our origin and mission directly align with the Plan Update efforts to address sustainability.

The Plan Update should have a clear role in supporting the California Water Action Plan. The California Water Action Plan, most recently updated in 2016, is the widely accepted statewide policy document guiding water resource management. The Plan Update should align with the Water Action Plan, define the next steps necessary to achieve all of its priority actions, and identify how those steps will be implemented.

The priorities in the California Water Action Plan will be achieved through local actions. Water management sustainability is predominantly going to be achieved through coordinated efforts at the local and regional level. The Plan Update recognizes that integrated regional water management (IRWM) has proved to be an effective management tool. There is an expectation that groundwater sustainability agencies (GSA) through the sustainable groundwater management act (SGMA) will also be an effective management tool. The Plan Update should focus primarily on how the state will support these local and regional efforts.

The state should track progress. The manner in which progress is evaluated is critical to ensuring that highest value actions become the highest priority. The Plan Update should be explicit on the mechanism that is intended to be used to track progress. It appears that the “Sustainability Outlook” appendix is intended to be related to the goals. Without greater explanation of the relationship between the goals and the Sustainability Outlook, it is hard for the reader to understand what the process will be to determine if goals are being achieved. We are supportive of tracking progress, but feel strongly that the metrics should be developed with input from local and regional water managers.
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It is important that the indicators in the Sustainability Outlook are not just aspirational but truly achievable. For example, the Distribution System Leaks and Losses indicator’s target outcome is “zero distribution system leaks and losses, indicating no money or energy is wasted following treatment and pressurization of water.” Zero water loss statewide is not technically achievable and the economic justification for financing such an outcome is questionable. If the indicators are to be the foundation of tracking progress toward sustainability, the purpose and achievability of these indicators must be clear and attainable.

**Funding is key.**

We appreciate the Chapter on investing. It is helpful to see what the state believes is financially necessary to achieve all of the goals in the Plan Update. Additionally, we appreciate the recognition that upwards of 85 percent of funding for water management is provided at the local level. A comprehensive analysis should acknowledge that expanding state requirements, such as a proposed water tax, create funding burdens on local agencies that take away from their ability to meet the goals of the Plan Update.

Many of the “Novel Funding Mechanisms” would negatively impact local agencies. Any funding scenario should be evaluated for its broader impacts. Also, it is not clear what role the “Novel Funding Mechanisms” play in achieving funding, as they do not appear to be used in the “Funding Scenarios” section. We suggest that if the “Novel Funding Mechanisms” are not being evaluated in the “Funding Scenarios” section that they be included only as an appendix for future discussion.

**We look forward to continuing to work with the State.**

RWA hopes that future updates to the Water Plan will support the Water Action Plan and support the role that local and regional agencies have in the implementation of the Water Action Plan. We support tracking progress and encourage the state to do so in consultation with local and regional agencies. Further, we appreciated the recognition that local funding is the most significant resource for water management, however, it is limited, and state imposed costs will erode the ability of local funds to meet needs. Finally we understand and appreciate the goal of making the Plan Update more accessible to a wider audience and not one that is overly prescriptive. In many ways, the January 8th Plan Update webinar presentation was clearer on the purpose, and direction of how the Plan Update will be utilized. We recommend that the Plan Update document be more aligned with the structure presented in the webinar.

RWA appreciates the opportunity to comment on the California Water Plan Update 2018 and we look forward to continuing work with the state as this Plan Update is completed and work on the 2023 Water Plan Update begins.

Sincerely,

[Signature]

John Woodling  
Executive Director  
Regional Water Authority

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1 Available on the Department of Water Resources website:  
https://www.youtube.com/watch?v=USkOL-8TXF8&feature=youtu.be