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

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

Dear Mr. Massera:

On behalf of SAWPA and the stakeholders of the One Water One Watershed Program in the Santa Ana Funding Area, thank you for this opportunity to provide input to the California Water Plan Update 2018.

As described in the Reviewer’s Guide, we have focused on the completeness of information, the organization of information, factual accuracy, primary messages, and relevance to SAWPA. Our comments though do not clearly fit separately into these categories, so are presented below in the order most closely matching the order of the Public Review Draft.

Though significantly abbreviated in form as compared to Update 2013, the Public Review Draft depicts a coherent message of the opportunities and challenges facing California in pursuit of sustainable water management and describes effectively the recommended management and policy actions for pursuing greater sustainability. DWR and its many partners should be congratulated for the huge update effort being so succinctly displayed, and for queuing up the next steps for Water Plan Update 2023.

Chapter 1
The opening paragraph (page 1-1) is excellent:

The state relies on a complex network of water storage and conveyance systems to control, capture, and store water when it is available in the wet winter and spring for use during the dry summer and fall. Many of these systems reflect World War II-era investments and were not designed to meet today’s environmental requirements or Californians’ current values and evolving needs. Deferred maintenance and the effects of a changing climate are affecting the ability of these systems to reliably meet those needs.
SAWPA encourages DWR to include the Integrated Regional Water Management Program on the enumerated list of important State Initiatives and Investments. For the past fifteen years the Program has played a central part in developing more integrated, regional, and collaborative water management across California. It is not universally successful, but in the aggregate is a critical investment in the social infrastructure of more sustainable water and watershed management. Given the structure of Goal 1, it seems a serious omission to have IRWM Program not alongside the other items in this list, including IRWM’s younger sibling, SGMA.

Chapter 2

At the beginning of Chapter 2, how “sustainability” is used becomes confusing. “Managing water resources for sustainability” implies that the broader societal goal of sustainability can be benefitted by water resources management. And, this is a new and helpful framing – that is, water management in support of a broader effort towards sustainability. However, in the blue call-out box, sustainability is defined as containing water resources management. This mixes up what is referring to what, leaving the message that the Plan encourages “managing water resources for...water systems.” We encourage a restructuring of the call-out box to better reflect that the Update 2018 acknowledges how effective water resources management is one key to achieving a broader societal sustainability. Managing water resources sustainably refers to the management, while managing water resources for sustainability refers to the sustainability, which is broader than just water resources.

On page 2-2 within the first full bullet is a discussion of homelessness. Through the Disadvantaged Communities Involvement Program, SAWPA has learned a significant amount about how challenging homelessness is as a social issue, and the complexity of its relationship to water resources and water resources management. In light of this learning, we recommend two changes to this paragraph.

- Remove “homeless” as a modifier on “encampments”. It is duplicative in the sentence itself and is stigmatizing. Referring to people experiencing homelessness as “the homeless” or “homeless” are both representations of how society struggles to maintain the humanity of people in this horrible situation. Another option would be to say “...the rise in homelessness has led to people living along...” Homelessness is a societal failure and approaching it as a humanitarian challenge requires that the humanity of those experiencing homelessness be constantly reinforced.
- The final sentence, starting “To compound...” is misguided, and should be deleted. To suggest that those who are experiencing homelessness are a burden on the other goals of society is unjust. Homelessness is a societal failure, and therefore a duty must be felt to support those experiencing homelessness.

SAWPA was happy to participate in piloting the Sustainability Outlook, which is an important step in the process of having data-driven adaptive management at the core of water management in California. The work of aligning the Sustainability Outlook and the One Water One Watershed Plan Update 2018 Sustainability Assessment advanced both plans and aligned them in important ways. SAWPA recognizes that water management is a continuum across scales, from the actions of a single person brushing their teeth, up to and including the impacts of carbon
emissions on the global atmosphere. In the case of the Sustainability Outlook, the state and regional scales are connected through the pilot program. We would appreciate the pilot partnership itself being called out in the plan, at least referenced in the short paragraph on Page 2-6 with guidance on how to find the work we pursued and successfully completed together.

Chapter 3

SAWPA is entirely supportive of **Goal 1 – Improve Integrated Watershed Management**, as this has long been practiced in the Santa Ana River watershed. SAWPA facilitates the One Water One Watershed process on behalf of millions of people, hundreds of agencies, over fifty cities and four counties. It is our sincere belief that integrated watershed management is the basis for continued prosperity and the ongoing progress towards sustainability in our service area.

However powerful this goal is in the Update 2018, we feel that the significant investment and ongoing successes of the Integrated Regional Water Management Program in California is missing from among the Recommended Actions. Continued investment, engagement and growth of this most critical state program for transforming water management to integrated watershed management must be included.

Goal 2 is equally important, and rightfully within the Update 2018. However, having a single recommended action seems inadequate to move properly towards that goal in the next five years. Luckily, that recommended action appears to have multiple activities in its description and could easily be broken into several. Our suggestion is:

- **Action 2.1 – Improve Infrastructure**
  - Continue and build upon recent efforts to evaluation and maintain State-owned and State-regulated water supply infrastructure and State Plan of Flood Control Infrastructure. Increase information sharing and public awareness of flood risk, and assist local entities through DWR’s Floodplain Management program.

- **Action 2.2 – Promote Long-Term Management**
  - Identify and evaluate opportunities to expand surface and groundwater storage capacity in the state. Consider opportunities to assist and support local managers to invest in continued operations, maintenance and rehabilitation of infrastructure.

Goal 4 is a critical component of the Update 2018. The work SAWPA has pursued in partnership with many related to the strengths and needs in overburdened and underpresented communities encourages the following recommendations to enhance this goal, and the Water Plan Update 2018 more generally.

- Throughout the document, wherever the syntax allows, replace “disadvantaged communities” with “members of disadvantaged communities”. It is important to re-center that the people, Californians, living and working in communities ARE the communities. Recommended Action 1.1 would benefit from humanizing both the need
and the solution with these simple phrase changes, for instance, “Address the Water Management Needs of Californians in the most vulnerable communities."

- How Goal 4 is written, and on page ES-1, under Bold Action to Overcome Challenges, the use of capital letters for “Under-Represented or Vulnerable Communities” changes words from adjectives to proper nouns, and therefore produces labels and further stigmatizes Californians. This is not best practice. Please correct to “underrepresented and vulnerable communities.”
  - In Action 4.1, the acronym SASC is without reference.
  - Action 4.2 references liaisons, which is not a term we are familiar with in the context it is being used here. If this is an existing program, it should be better referenced. If it is a new program, it should be described more completely. This recommended action has parallels to a recommendation made by the Council for Watershed Health in 2013 (page 19-20 here: https://water.ca.gov/-/media/DWR-Website/Web-Pages/Work-With-Us/Grants-And-Loans/IRWM-Grants/Files/Prop-1-DACI/Files/Greater-Los-Angeles-County-DAC-Outreach-Evaluation-Study.pdf) and within the 2015 Disadvantaged Communities Visioning Workshop (page 5 here: https://water.ca.gov/-/media/DWR-Website/Web-Pages/Work-With-Us/Grants-And-Loans/IRWM-Grants/Files/Prop-1-DACI/Files/DAC-2014-Visioning-Workshop.pdf)
  - The proposed investments for Goal 4 in Table 4-1 seem wholly inadequate to the need across the state. It is not clear from that table of how the estimate was made, even following review of the supporting documentation. If this number is based on an analysis, it would be important to explain why it is so small as opposed to the ongoing Disadvantaged Community Involvement Program, which invests $51 million over three years.

Goal 6 is also a necessary ingredient to the Update 2018. The OWOW Plan Update 2018 also oriented one of its strategic workgroups to considering Data Management & Monitoring as critical to increased watershed sustainability. One key insight of the OWOW Plan Update 2018 that isn’t documented in the CA Water Plan Update 2018 is that data collection and accumulation is becoming easier and cheaper, and without better data management systems we are likely to be overwhelmed by meaningless or apparently contradictory data. For this reason, SAWPA is strongly in support of the inclusion of this goal in the Update 2018. One concern is again with language, where Action 6.5 suggests we “Bolster Reporting Requirements...” Bolster isn’t the right word, for it suggests the need for adding reporting requirements. “Ensure effective and streamlined reporting requirements...” would be a better encapsulation of the recommendation.

Chapter 4

In Chapter 4, we found with satisfaction (page 4-2, second paragraph) the brief discussion of the IRWM Program and the role it has played supporting the linkages between local authority, regional action, and state capacity. It is good that it is here. However, the reference is brief,
unremarkable except for those who know to look for it, and sadly it underplays the importance of the IRWM Program broadly. Just as this Update 2018 considers the impacts of failing to maintain the investment in physical infrastructure, it needs to consider the social and governance infrastructure, if you will, that has been the most important achievement of the investment in the IRWM Program for the past fifteen years. A failure to maintain those partnerships, trust and shared purpose will be as damaging to the future goals of Update 2018 as will be the failure to support physical infrastructure improvements.

In Conclusion

The California Water Plan Update 2018 is a compelling adaptation of earlier Water Plans and represents a strong foundation for water management across California, and in support of Update 2023. The focus on integrated watershed management in support of societal sustainability is welcome, and we congratulate the Department and all the stakeholders who helped build this plan. With the improvements we have suggested above, SAWPA is supportive of moving this Plan to completion and delivery to the Legislature.

If any of the comments provided above is unclear, please contact Mark Norton (mnorton@sawpa.org | 951-354-4221) with questions.

Sincerely,

Richard E. Haller, P.E., ENV SP
General Manager